

# ENSV Inspection Transmittal Summary Report

**Media:**

RCRA

**Inspection Type:**

Other

**Inspection Date:**

04/05/2017

**Preliminary SNC Findings:****Inspector:**

MICHAEL MARTIN

**Transmittal Date:**

5/5/2017

NOV / NOPV / NOPF:

No

**Facility Name:**

Recycletronics

MAY 05 2017

**Address:**

1220 Steuben Street

Sioux City

IA

51105

**ID Number:**

[REDACTED]

**Activity Number:****MM Participating Programs:**

Exemption 2

**Federal Activity:****Federal Facility:**

No

**Potential EJ:**

<b>SBREFA Provided:</b>	<b>Security Handout Provided:</b>	<b>MM Screening Completed:</b>	<b>EMS ISO 14001:</b>	<b>Compliance Officer:</b>
No	No	N/A	No	REBECCA WENNER

**Selection Criteria 1:**

Case Development

**Selection Criteria 2:****ACS Code:****Inspection Findings:**

Case development inspection.

**Target Quality:**

Case development inspection.

# REPORT OF RCRA CASE DEVELOPMENT INSPECTION

At

## RECYCLETRONICS

### Main Site

1220 Steuben Street  
Sioux City, Iowa 51105  
EPA ID Number: [REDACTED]

Exemption 2

### G Street Site

2301 G Street  
South Sioux City, Nebraska 68766  
EPA ID Number: None

### Foundry Site

Foundry Road  
West  $\frac{2}{3}$  of Southeast  $\frac{1}{4}$ /Southwest  $\frac{1}{4}$   
Unplatted 22-29-5/25 Acres  
Section-Township-Range 22-29-9E  
Parcel ID 220054789  
Sioux City, Nebraska 68766  
EPA ID Number: None

### Akron Farm Site

16998 160<sup>th</sup> Street  
Akron, Iowa 51001  
EPA ID Number: None

### Feed Mill Site

3035 Highway 75 North  
Sioux City, Iowa 51105  
EPA ID Number: None

### Scandinavian Site

1801-03 4<sup>th</sup> Street  
Sioux City, Iowa 51101  
EPA ID Number: None

On

April 4-5, 2017

By

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region VII  
Environmental Sciences and Technology Division

## 1.0 INTRODUCTION

At the request of the Air and Waste Management Division, Ms. Wenner and I conducted a Resource Conservation and Recovery Act (RCRA) case development inspection (CDI) at Recycletronics' Main Site, G Street Site, Foundry Site, and Akron Farm Site on April 4, 2017. On April 5, 2017, we conducted a RCRA CDI at Recycletronics' Feed Mill Site and Scandinavian Site. The inspection was conducted under the authority of Section 3007(a) of RCRA, as amended. The inspection report and attachments present the results of the CDI.



## 2.0 PARTICIPANTS

### Recycletronics:

Aaron Rochester, Owner of Recycletronics  
Ray Riley, Recycletronics Employee - Main Site  
DA Davis, Property Owner of the G Street and Foundry Sites  
Dan Goodman, Property Owner of the Akron Farm Site  
Donny Dugan, Burlington North Sante Fe Railway - Feed Mill Site  
Todd Shumansky, Property Owner of the Scandinavian Site  
Officer Chad Stroman, Sioux City, Iowa Police Department (SCPD)

### U.S. Environmental Protection Agency (EPA):

Michael J. Martin, Physical Scientist  
Rebecca Wenner, Physical Scientist

## 3.0 INSPECTION PROCEDURES

Prior to beginning the CDI, Ms. Wenner and I coordinated with the SCPD on the morning of April 4, 2017, to accompany us to the Main Site. On April 4, 2017 (7:54 a.m.), Officer Stroman, Ms. Wenner, and I arrived at the Main Site. The front door of the facility was unlocked and the building was empty of personnel. At 8:12 a.m., Ms. Wenner contacted Mr. Rochester on her cell phone. Mr. Rochester stated that he was allowing EPA inspection access, he would not be at the facility until 10:30 a.m., and Mr. Riley would be his representative in his absence. Fifteen minutes later, Mr. Riley arrived at the Main Site and the visual inspection of the facility began. At 10:30 a.m., Mr. Rochester arrived at the Main Site. Ms. Wenner and I presented him with our EPA credentials and explained the purpose and procedures of the inspection. I next presented him with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information, presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002, and informed him of his confidentiality rights. At the conclusion of the inspection, I provided Mr. Rochester with a *Confidentiality Notice* (attachment 1), which he signed as acknowledgement of receipt. No confidentiality claims were made by Mr. Rochester (attachment 1).

The CDI focused on:

1. Collecting an inventory of crushed/broken leaded glass, intact/broken cathode ray tubes (CRT), unprocessed E-waste, and components at each site.
2. Conducting X-ray fluorescence (XRF) qualitative screening on three to 11 samples of broken glass at each site to confirm the presence of leaded glass at each site.
3. Collecting one confirmatory glass sample at each site to verify the XRF's qualitative indication of leaded glass.
  - a. Collecting a confirmatory non-leaded glass sample at the Main Site.

4. Conducting XRF quantitative screening on the soil around the outdoor pile of broken glass located at the G Street Site.
5. Collecting confirmatory soil samples at the G Street Site to determine if lead may be leaching from the outdoor pile of broken glass.
6. Collecting a water sample (rain water puddle) around the outdoor pile of broken glass at the G Street Site.

Ms. Wenner provided assistance with inspection coordination, sample collection, XRF screening, and photograph collection. See attachments 1-10 and photos 1-66 (with attached photolog) for inspection documentation.

#### **4.0 SITE INVENTORY AND XRF SCREENING DATA**

See attachment 2 for the inventory of crushed leaded glass, intact/broken CRTs, unprocessed E-waste, and components. See attachment 3 for the XRF Screening Data Summary.

#### **5.0 SAMPLE COLLECTION, ANALYSIS, AND DISCUSSION**

##### **5.1 Purpose and Objective**

The purpose and objective of the sampling activity is discussed in the Quality Assurance Project Plan (QAPP) with Addendum (attachment 4).

##### **5.2 Samples Collected and Sample Locations**

During the sampling activity the weather was cool, sunny, and windy. Ms. Wenner and I collected seven glass samples, three soil samples, one background soil sample (Raymond Park, South Sioux City, Nebraska), one water sample, one blank sample, and one field duplicate. See attachment 3 for the sample descriptions and locations. The field duplicate was collected and used to calculate precision. Split samples were offered to Messrs. Rochester, Davis, Goodman, Dugan, and Shumansky, which they did not accept. See attachment 5 for the Site Safety Plan and see attachment 6 for the Chain-of-Custody Form/Field Sheets.

##### **5.3 Analytical Results and Observations**

Broken leaded glass samples from all the sites (except for the Foundry Site) exceeded the toxicity characteristic leaching procedure (TCLP) regulatory limit for lead (samples 1, 7, 104, 106, and 107). Two of the four soil samples (samples 6 and 6FD) collected at the G Street Site indicated the presence of lead, but did not exceed the TCLP regulatory limit for lead. The water sample (sample 201) collected at the G Street Site indicated the presence of lead. See attachments 3 and 7 for the Sample Summary/Analytical Results.

#### **5.4 Quality Control (QC) Analysis**

According to the QAPP, the acceptance limit for the precision assessed via the field duplicate will be less than or equal to 50% relative percent difference. The field duplicate falls within the acceptance limits as defined in the QAPP. See attachment 8 for the QC Calculations.

#### **6.0 SUMMARY OF DISCUSSIONS WITH FACILITY REPRESENTATIVES**

About mid-morning on April 4, 2017, representatives of three news stations (Channel 4, Channel 9, and KMEG4) arrived at the Main Site. Ms. Wenner did not discuss any details of the inspection and provided them with contact information for EPA Region 7's Office of Public Affairs. Upon Mr. Rochester's arrival to the Main Site, Ms. Wenner provided him with a Request for Information letter (attachment 9). Ms. Wenner verbally went through each question with him and verified that he understood each question.

Mr. Rochester provided the following information to Ms. Wenner, in response to each of the numbered questions in the Request for Information letter:

1. Mr. Rochester stated that he did not sell Recycletronics to Ted Hamilton and Mr. Hamilton was forming his own company independent of Recycletronics. He stated that he believed Mr. Hamilton was going to use the name Electronic Recycling Solutions.
2. Mr. Rochester stated that he previously rented the Feed Mill Site from "Mike" and Mike contacted him after the sale of the facility. He stated that he was not given the contact information of the buyer/new owner. He stated that he lost track of his "stuff" in the building and he probably put "stuff" in the building around 2012 and 2013. He stated that he used the building for the storage of CRT glass. He stated "there might be some full units, but should just be CRT glass." He stated that he might have used "KMB" to help him move the "stuff" to the site, but he used his own truck.
3. Mr. Rochester stated that he used a 9,000 square-foot building (Akron Farm Site) to store electronics and a mixture of everything. He stated that he moved "stuff" into the building in 2013. He initially stated that he sends a check to someone every month, but couldn't remember the person's name. He stated that he thought the owner of the building was Paul Seaman, who is a chef in Sioux City. He later stated that he remembered sending checks to Dan Goodman. He stated that he only used the building for storage of electronics and he used Triple D contracting to move the "stuff" to the site in 2013 and 2014. He stated that he may need to process the electronics to empty the building.

4. Mr. Rochester stated that the following sites are currently empty of his waste:
- a. 1313 11<sup>th</sup> Street, Sioux City, Iowa.
  - b. 3313 Northbrook Drive, Sioux City, Iowa.
  - c. 1530 Steuben Street, Sioux City, Iowa.
  - d. 1219 5<sup>th</sup> Street, Sioux City, Iowa (an additional site that was not listed in the Request for Information letter).

Ms. Wenner asked Mr. Rochester several times if there were any additional sites (not listed in the Request for Information letter) where he has operated, currently operating, or stored materials and waste. Mr. Rochester stated “No” and “You found all my hiding places.”

At the Foundry Road Site, Ms. Wenner and Mr. Davis discussed how the broken glass at the site came to be there. Mr. Davis stated, “Aaron Rochester brought a lot of cardboard boxes of glass to the site in October 2015.” Mr. Davis stated that he instructed his crew to dump the glass on the ground and he then burned the glass, cardboard boxes, and pallets. Mr. Davis stated that his crew removed the metal from the glass and a pile of dirt and glass was left at the site.

## **7.0 SUMMARY**

No violations of RCRA were cited at the time of the inspection. Further EPA review will be needed to determine if violations of RCRA had occurred.



Michael J. Martin  
Physical Scientist  
Date: May 4, 2017

#### Attachments

- 1) *Confidentiality Notice* (1 page)
- 2) Site Inventory Summary (1 page)
- 3) Summary Results (XRF and TCLP)/Sample Descriptions and Locations (6 pages)
- 4) QAPP with Addendum (33 pages)
- 5) Site Safety Plan (2 pages)
- 6) Chain-of-Custody Form/Field Sheets (15 pages)
- 7) TCLP Results (9 pages)
- 8) QC Calculations (1 page)
- 9) Request for Information Letter (6 pages)

Photo Log (7 pages)

Photographs (35 pages/66 photos)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

Facility Name <i>Reapdetronics</i>	
Facility Address <i>1220 Steuben Street Sioux City, Iowa 51105</i>	
Inspector (print) <i>Michael S. Martin</i>	
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219	Date <i>04/04/2017</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Artem Rochester</i>	Signature/Date <i>[Signature]</i> <i>4/4/17</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

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## Summary of Inventory by Site - Recycletronics

	Crushed Leaded Glass				Intact/broken CRTs			Unprocessed e-waste			Components		
Site	GB <sup>1</sup>	Other	Volume (Yds <sup>3</sup> )	Weight (lbs <sup>5</sup> )	GB	Volume (Yds)	Weight (lbs)	GB	Volume (Yds)	Weight (lbs)	GB	Volume (Yds)	Weight (lbs)
Steuben	320		632	1,248,000	41	81	48,380	405	800	283,156	20	40	13,983
G-Street	--	60'x120'x70" (high) pile, and 74 plastic totes <sup>2</sup>	1,711	3,378,684	--	--	--	--	--	--	--	--	--
Foundry	--	40x100x4 ft	593	1,170,987	--	--	--	--	--	--	--	--	--
Akron <sup>3</sup>	2,160	--	4,266	8,424,000	--	--	--	--	--	--	--	--	--
Feed Mill	564	--	1,114	2,199,600	--	--	--	--	--	--	--	--	--
Scandinavian Bldg	--	--	--	--	421	831	496,780	--	--	--	--	--	--
<b>Total</b>	<b>3044</b>		<b>8,316</b>	<b>16,421,271</b>	<b>462</b>	<b>912</b>	<b>545,160</b>	<b>405</b>	<b>800</b>	<b>283,156</b>	<b>20</b>	<b>40</b>	<b>13,983</b>

<sup>1</sup>GB=Gaylord Box.

<sup>2</sup> There are 74 plastic totes for a total volume of 155.4 yd<sup>3</sup> in the plastic totes; the volume in the pile is estimated at 1,556 YD<sup>3</sup>, for a total of 1,711 yd<sup>3</sup> at the site.

<sup>3</sup> Throughout the building, gaylord boxes were stacked 2 and 3 high, although most were stacked 3 high. It is assumed that the stacks were about 10 feet high (3x40").  
 -- indicates that this box is not applicable.

### Assumptions:

1. Gaylord box is 48"x48"x40" (high), or 1.975 Cubic Yards (volume).

2. Plastic totes are 43"x43"x53" (high), or 2.1 yds<sup>3</sup> (volume).

3. A building measurement of 180 x 65 ft was estimated from Google Earth Images. Based on the building measurement, it is estimated that the GBs were placed with about 16 wide and 45 long in the building and the inspectors noted that they were stacked 3 high. The boxes appear to be mostly broken glass, but some intact/broken CRTs were observed. Calculations were based on broken glass.

4. Based on "Volume-to-Weight Conversion Factors, U.S. EPA Office of Resource Conservation and Recovery, April 2016", the weight for unprocessed e-waste and components was each estimated at 354 lbs per yd<sup>3</sup>.

5. Based on this recycler's website (<http://iagreenstar.org/where-your-electronics-go/>) a GB of crushed CRT glass weighs about 3900 pounds.



Sample Results - Recycletronics

XRF Reading No.	Confirmation Sample ID (R7 Sample No.)	Site	Date/Time	Matrix	Sampler	XRF Result Pb (PPM)	Pb %	GPS Long	GPS Lat	R7 Lab TCLP Pb (mg/kg)	R7 Lab Total Pb (mg/kg or ppm)	Notes	Photo No.
9		Steuben	4/4/2017 8:22		Rwenner	<LOD						Test Sample - Not an actual sample field sample	
10		Steuben	4/4/2017 8:24	Glass	Rwenner	142.08	0.01					Test Sample - Not an actual sample field sample	
13		Steuben	4/4/2017 10:18	Glass	Rwenner	252946.8	25.29						
14		Steuben	4/4/2017 10:19	Glass	Rwenner	199529.56	19.95						
17		Steuben	4/4/2017 10:22	Glass	Rwenner	675.05	0.07						
18		Steuben	4/4/2017 10:28	Glass	Rwenner	2422.84	0.24						
19		Steuben	4/4/2017 10:30	Glass	Rwenner	297221.41	29.72						
21		Steuben	4/4/2017 10:31	Glass	Rwenner	221667.95	22.17						
22		Steuben	4/4/2017 11:06	Glass	Rwenner	199674.95	19.97						
24	1	Steuben	4/4/2017 11:07	Glass	Rwenner	231474.95	23.15			6.84	1020		11
25	2	Steuben	4/4/2017 11:17	Glass	Rwenner	359.11	0.04			ND	ND		
26	2	Steuben	4/4/2017 11:18	Glass	Rwenner	333.14	0.03			ND	ND		
28	3	Background	4/4/2017 12:45	Soil	MMARTIN	21.35	0.00			ND	32.5	Background	18
31		G Street	4/4/2017 13:07	Soil	MMARTIN	41.29	0.00					Across the street by homes	
32		G Street	4/4/2017 13:08	Soil	MMARTIN	54.6	0.01					Across the street by homes	
33		G Street	4/4/2017 13:10	Soil	MMARTIN	23	0.00					Across the street by homes	
34		G Street	4/4/2017 13:11	Soil	MMARTIN	321.49	0.03					On the right-of-way by the pile	
35		G Street	4/4/2017 13:14	Soil	MMARTIN	129.47	0.01					On the right-of-way by the pile	
37		G Street	4/4/2017 13:16	Soil	MMARTIN	88.87	0.01					On the right-of-way by the pile	
39		G Street	4/4/2017 13:17	Soil	MMARTIN	74.42	0.01					On the right-of-way by the pile	
40		G Street	4/4/2017 13:19	Soil	MMARTIN	66.62	0.01					On the right-of-way by the pile	
42		G Street	4/4/2017 13:20	Soil	MMARTIN	418.34	0.04					On the right-of-way by the pile	
43	4	G Street	4/4/2017 13:22	Soil	MMARTIN	531.29	0.05	42°28'05.444"N	96°24'19.070"W	ND	52.6	On the right-of-way by the pile	19
45		G Street	4/4/2017 13:24	Soil	MMARTIN	432.91	0.04					On the right-of-way by the pile	
46		G Street	4/4/2017 13:25	Soil	MMARTIN	341.31	0.03					On the right-of-way by the pile	
47	5	G Street	4/4/2017 13:27	Soil	MMARTIN	3262.96	0.33	42°28'06.045"N	96°24'17.558"W	0.385	407	On the right-of-way by the pile	20-22
48	6	G Street	4/4/2017 13:30	Soil	MMARTIN	3757.99	0.38	42°28'06.101"N	96°24'17.320"W	2.73	1020	On the right-of-way by the pile (Confirmation sample 7449-6-G)	23
	6-FD	G Street	4/5/2017 13:30	Soil	MMARTIN			42°28'06.101"N	96°24'17.320"W	2.48	833	On the right-of-way by the pile (Confirmation sample 7449-6-FD) Field Duplicate of 7449-6-G)	23
49		G Street	4/4/2017 13:32	Soil	MMARTIN	46.66	0.00					Across the street by homes (Directly across from XRF Reading No. 48 location)	
50		G Street	4/4/2017 13:33	Soil	MMARTIN	361.82	0.04					Across from the pile/tree stump	
51	7	G Street	4/4/2017 14:46	Glass	MMARTIN	158693.19	15.87			78.4	20700	Glass from the pile	
52	7	G Street	4/4/2017 14:47	Glass	MMARTIN	227140.83	22.71			78.4	20700	Glass from the pile	
	201	G Street	4/4/2017 0:00	Water	Rwenner					*	12600	Water sample from puddle directly adjacent to glass pile	
53		Foundry	4/4/2017 15:34	Glass	MMARTIN	37998.95	3.80						24
54		Foundry	4/4/2017 15:35	Glass	MMARTIN	17531.39	1.75						24
55		Foundry	4/4/2017 15:37	Glass	MMARTIN	27634.54	2.76						24
57	103	Foundry	4/4/2017 15:38	Glass	MMARTIN	801.14	0.08			3.86	401		24
58	103	Foundry	4/4/2017 15:43	Glass	MMARTIN	233011.45	23.30			3.86	401		24
59	103	Foundry	4/4/2017 15:44	Glass	MMARTIN	1822.48	0.18			3.86	401		24
60	103	Foundry	4/4/2017 15:46	Glass	MMARTIN	263000	26.30			3.86	401		24
61	104	Akron	4/4/2017 17:34	Glass	MMARTIN	273233.88	27.32			11	1960		27



Sample Results - Recycletronics

XRF Reading No.	Confirmation Sample ID (R7 Sample No.)	Site	Date/Time	Matrix	Sampler	XRF Result Pb (PPM)	Pb %	GPS Long	GPS Lat	R7 Lab TCLP Pb (mg/kg)	R7 Lab Total Pb (mg/kg or ppm)	Notes	Photo No.
62		Akron	4/4/2017 17:35	Glass	MMARTIN	28340.45	2.83						
63		Akron	4/4/2017 17:36	Glass	MMARTIN	190226.03	19.02						
64		Akron	4/4/2017 17:47	Soil	MMARTIN	24.68	0.00					Ground outside the building on the north side	
65	105	Field Blank	4/4/2017 18:40	Glass	Rwenner	<LOD				ND	ND	Drinking glass purchased to be used as field blank	
68		RCRA Blank	4/5/2017 11:23		MMARTIN	498.46	0.05					RCRA Standard - Not an actual sample field sample	
69		Feed Mill	4/5/2017 11:29	Glass	MMARTIN	251159.3	25.12						
70	106	Feed Mill	4/5/2017 11:30	Glass	MMARTIN	280909.81	28.09			8.54	1440		
71	106	Feed Mill	4/5/2017 11:31	Glass	MMARTIN	267572.69	26.76			8.54	1440		
72	107	Scandinavian	4/5/2017 13:46	Glass	MMARTIN	194083.34	19.41			7.71	1090		
73	107	Scandinavian	4/5/2017 13:47	Glass	MMARTIN	217360.83	21.74			7.71	1090		

NDNot detected above laboratory reporting levels.

Indicates TCLP Pb result greater than reguatory limit of 5 mg/L.

Indicates Total Pb result is greater than the default soil clean-up value of 1200 ppm for non-residential/commercial sites as found in the Superfund Lead-Contaminated Residential Sites Handbook, 2003.

Indicates Total Pb result is greater than the default soil clean-up value of 400 ppm for residential sites as found in the Superfund Lead-Contaminated Residential Sites Handbook, 2003.

\*Not enough sample to analyze for TCLP.

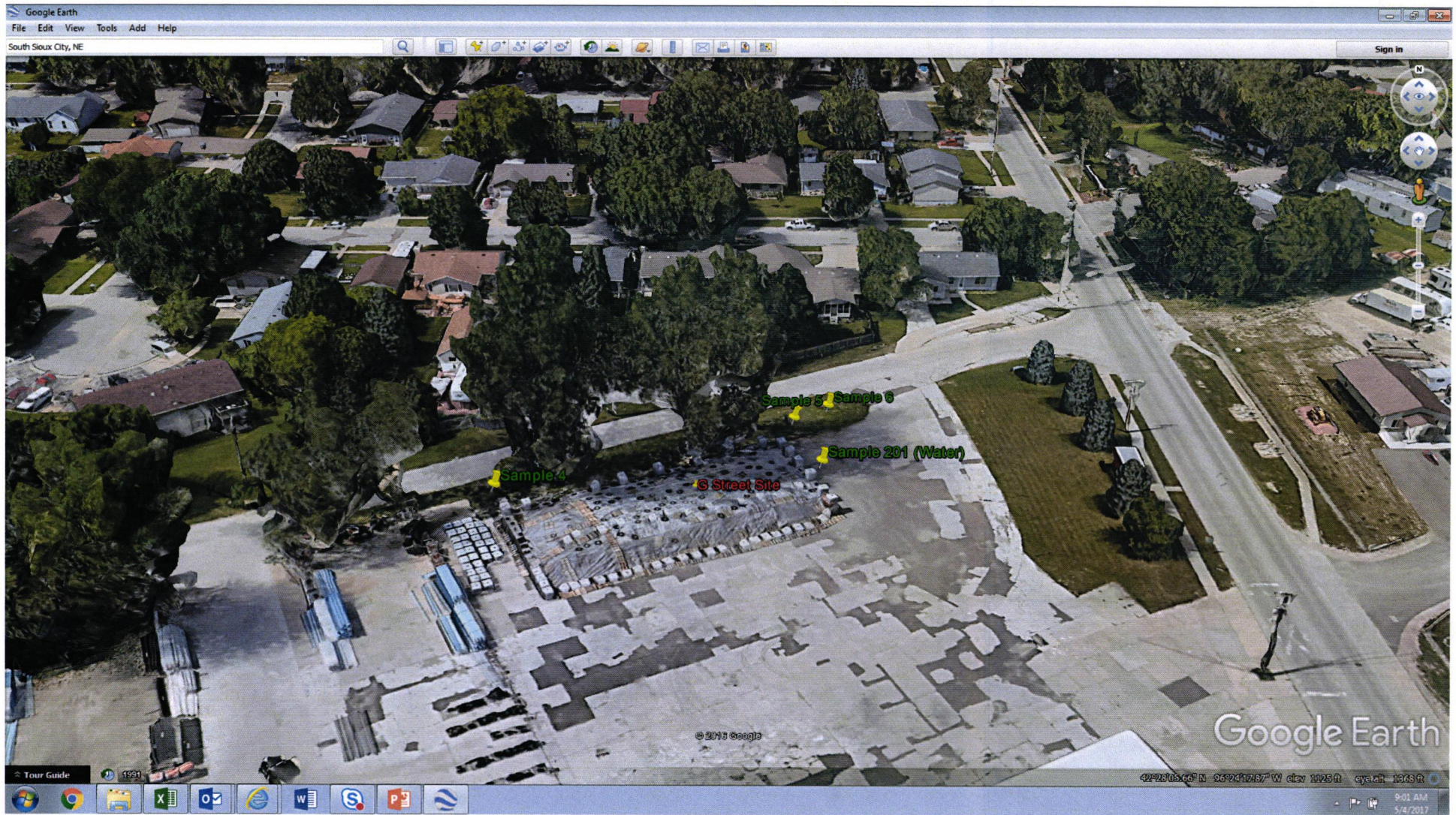
ppmParts per million



Recycletronics – IAR000519827

Location of Soil and Water Samples taken at the G-Street Site

Image Taken from Google Earth









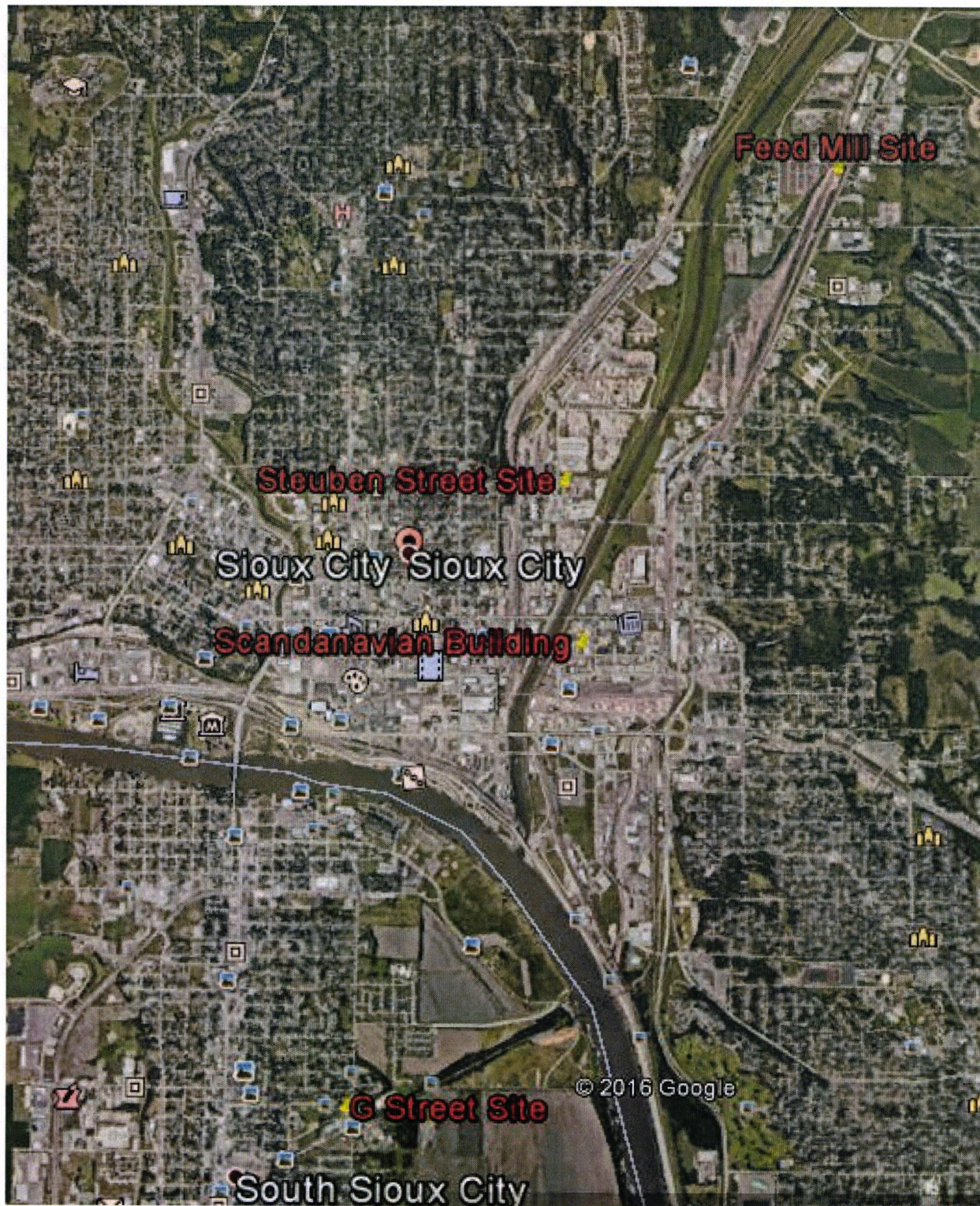
G Street  
Site -  
Glass Pile

Elementary  
School





Overview of the site locations from Google Earth images





Quality Assurance Project Plan  
Addendum 1  
for  
RCRA Compliance Sampling  
at

Recycletronics

Site Addresses/locations listed in the Addendum

Sioux City, IA

And

South Sioux City, NE

Prepared by  
Rebecca Wenner  
March 2017

Rebecca Wenner  
Rebecca Wenner, RCRA QAPP Co-Coordinator

3/27/2017  
Date

Michael J. Martin  
Michael J. Martin, RCRA QAPP Co-Coordinator

03/27/2017  
Date

Mary Goetz  
Mary Goetz, EPA AWMD/WEMM Branch Chief

27 Mar 17  
Date

Diane Harris  
Diane Harris, Regional Quality Assurance Manager  
Data Integrations and Support Operations Branch

04/03/2017  
Date

RECEIVED  
2017130  
MAR 23 2017

This addendum includes only those sections of the original document being modified or replaced.

#### A5. PROBLEM DEFINITION/BACKGROUND

This entire section is being replaced from the original document.

Recycletronics is an e-waste recycling company owned and operated by Aaron Rochester. Mr. Rochester may be in the process, or may have already sold the business to another party. The facility has operated at several locations in and around Sioux City, Iowa and South Sioux City, Nebraska. Recycletronics moved their main e-waste receiving and processing operations to the 1220 Steuben Street site in August 2016. E-waste is broken down into components that include metal, memory cards, plastic, non-leaded glass, and leaded glass. The cathode ray tube (CRT) is the component within televisions and computer monitors (not including flat screen televisions) that has a hazardous component of lead. The CRT is broken down by removing the panel glass which is the flat screen on the front of the CRT, and then breaking up the funnel glass which is a funnel shape at the rear of the CRT. The funnel glass has a coating on its surface that includes lead (Pb). Recycletronics receives intact e-waste that includes CRTs as well as CRTs that have already been removed from e-waste by other recyclers. When separating the panel glass from the funnel glass, Recycletronics puts the broken panel (non-leaded) glass and the broken funnel glass (leaded glass) into separate containers. Both the non-leaded and leaded broken glass are stored in Gaylord boxes which are 1-yd<sup>3</sup> capacity, cube shaped cardboard boxes that are generally open (have no cover), but have flaps that can be closed before shipping. The Gaylord boxes viewed by EPA during the December 2016 inspection of Recycletronics were not covered (the flaps were not closed). Many of these boxes were also in poor condition because they were ripped down the side or had large holes that allowed broken glass to spill onto the floor.

Following is the complete address for the main facility operations (referred to during this addendum as the "Steuben Street" site).

Steuben Street site  
1220 Steuben Street  
Sioux City, Iowa

EPA has information that Mr. Rochester and/or Recycletronics is storing e-waste components, including leaded glass, indoors in Gaylord boxes at each of the following locations:

Scandinavian Building  
1801-03 4<sup>th</sup> Street  
Sioux City, IA

Feed Mill Site  
3035 Highway 75 North  
Sioux City, Iowa



If water is present under or around the G street broken glass pile, then EPA will attempt to pull a sample of the water to be analyzed for lead concentration. XRF screening will not be used on the water.

A background soil sample will be collected at a nearby elementary school or park. A drinking water glass will be used as a blank for the glass.

#### **A6. PROJECT/TASK DESCRIPTION**

This section is being modified to include the following information.

A fourth goal of this sampling and inspections is to determine how much hazardous waste is present at each location. To achieve this goal, a detailed inventory will be attempted at each site. EPA does not expect to be able to obtain an accurate count of the number of containers or their contents due to conditions at the sites, including lighting and the way in which containers are stacked and stored tightly together. These conditions will prevent inspectors from walking around and checking the contents and conditions of each container, but an attempt will be made to obtain the most detailed count possible.

Glass (waste) samples will be analyzed for both total and TCLP metals (including mercury), regardless of the total metals analysis. A background glass sample will be collected using a drinking glass obtained from a local store prior to the sampling. The glass will be double bagged in a freezer weight, gallon sized zipper style plastic bag, which is the same containers that will be used for the other glass samples. Bagging of the background glass sample will occur off-site to prevent contamination from the site, and it will occur prior to the other sampling. Once collected, the sample will be placed in the cooler and managed as the other glass samples.

Background soil samples will be collected from a nearby elementary school ballfield if permission can be obtained from school officials, alternatively, a sample will be collected from a nearby park.

Sampling will occur in April 2017.

##### **A7.1.1. Precision and Accuracy**

This section is being modified to include the following information.

If a water sample is collected, preservative will be used according to all method requirements and laboratory-provided containers will be used. Collection of a water sample is unlikely, but we will be prepared to collect one if water is present in sufficient quantities around the glass pile at G street to be collected.

##### **A7.1.2. Representativeness**

This section is being modified to include the following information.

Farm near Akron, Iowa  
16998 160<sup>th</sup> Street, Akron, IA

EPA has information that Mr. Rochester and/or Recycletronics is storing e-waste components, including leaded glass, outdoors in piles, possibly buried, at the following location:

Foundry Road Site  
There is no exact address for this site.  
Foundry Road  
WEST 2/3 OF SE1/4 SW1/4  
UNPLATTED 22-29-9 25 ACRES  
Section-Township-Range 22-29-9E  
Parcel ID 220054789

EPA has information that Mr. Rochester and/or Recycletronics is storing e-waste components, including leaded glass, outdoors in one large pile at the following location:

G Street Site  
2301 G Street  
South Sioux City, NE 68766

EPA has repeatedly asked Mr. Rochester for records documenting that he is not speculatively accumulating leaded glass and other components at his multiple sites. Mr. Rochester has failed to provide any records and EPA has therefore concluded that he is speculatively accumulating leaded glass and other components at the multiple sites. EPA has researched studies performed on leaded glass from CRTs and based on that research, believes that it will fail TCLP for lead. Because EPA believes that the leaded glass will fail TCLP for lead, meaning that the lead levels will exceed the regulatory limit for lead, the leaded glass would be a hazardous waste.

EPA will use an XRF unit to screen 3 to 11 samples of glass at each location in order to confirm that there is leaded glass at each site. The XRF will provide a qualitative screening that will indicate that lead is present. Because of the difficulties of sampling and analyzing the glass using traditional methods, and the inherent risks of working with this media (glass), only one confirmatory sample will be collected per site, to verify that the XRF's qualitative analysis did indicate leaded glass.

EPA will also use an XRF unit to screen soil around the outdoor pile of broken glass at the G Street location, and possibly to screen soil around any visible piles found at the Foundry Road site. Because the XRF unit is set for soil analysis, we should receive more quantitative results for the concentrations of lead present, which will allow us to pull confirmatory soil samples at locations that indicate that lead may be leaching from the piles of broken glass and possibly running off the site(s).

EPA will use an XRF unit to determine lead concentrations in the soil and glass and will choose the confirmation sample locations based on the results. Confirmation samples will be taken only at locations where high lead levels are shown by the XRF. The only exception will be that at one of the sites where leaded glass and non-leaded glass are stored in separate containers, EPA will collect a confirmation sample of the non-leaded glass as well as the leaded glass.

## **A8. SPECIAL TRAINING REQUIREMENTS/CERTIFICATION**

### **A8.1 Personnel**

This section is being modified to include the following information.

Prior to conducting this sampling activity, each inspector will have completed at a minimum the following training:

- f. Radiation safety training in order to use the XRF.
- g. Hands-on training on the use of the XRF, including calibration, sampling, and interpretation of the results.

## **B1. SAMPLING PROCESS DESIGN**

### **B1.1 Health and Safety**

This section is being modified to include the following information.

An XRF unit will be used to screen samples for concentrations of lead.

### **B1.2 Samples**

#### **B1.2.1 Waste Streams in Drums and/or other open containers**

This section is being modified to change the following information.

The following sentence will be changed from: "The total number of container samples will be no more than six (6)." To read:

The total number of glass samples will be no more than ten (10), which includes one blank sample.

#### **B1.2.2 Solid Waste Stream Spills and Piles**

This section is being modified to change the following information.

The following sentence will be changed from: "For this project, surface soil is defined as the top

0-2 inches of soil. The total number of surface soil samples selected for sampling will be up to three (3).” To read:

For this project, surface soil is defined as the top 0-2 inches of soil. The total number of surface soil samples selected for confirmation sampling will be up to six (6), which includes one background sample.

#### **B1.2.4 Background Soil**

This entire section is being replaced from the original document.

One (1) surface soil background sample will be collected from a nearby elementary school if permission can be obtained from school officials. Alternatively, the background sample will be collected from a nearby park. Only one background sample will be collected.

## **B2. SAMPLING METHODS REQUIREMENTS**

This section is being modified to include the following information.

- SOP No. 1707 - X-METTM 880 FIELD PORTABLE X-RAY FLUORESCENCE OPERATING PROCEDURES

### **B2.1. Sampling**

This section is being modified to change the following information.

The first paragraph, “Drum Waste” and the second paragraph “Waste Piles” will be replaced with the following:

Glass Waste: Broken glass is stored in Gaylord boxes on all properties except the G-street site, where it is stored in a large pile on the ground and the Foundry Road Site, where it may be stored in piles on the ground or it may have been buried. Samples will be collected from the piles and the Gaylord boxes using the inspectors gloved hand. Personal Protective Equipment (PPE) in the form of coated Kevlar gloves will be used, and these gloves will be covered with disposal latex or nitrile gloves that can be changed between samples. Glass will be collected from the surface; inspectors will not dig into the containers or the piles to collect the glass due to safety concerns. Broken glass will be picked up by the inspector and placed directly into the sample container. All further processing and homogenization will occur at the laboratory. XRF readings will be used to determine where to collect the samples in the pile or containers.

The following information is being added to this section:

Water Samples: If water is present in sufficient quantities at the G street location to be collected, then one water sample will be collected. Inspectors will use an unpreserved container provided

by the laboratory to scoop water from a ponding area expected to be less than 2 inches deep. Water will be poured from this container into the sample container and preserved as prescribed by the method. The action will be repeated until sufficient water is collected, or until no more water can be collected.

## **B2.2. Additional Requirements**

This section is being modified to change the following information.

The second paragraph will be replaced with the following:

The estimated total number of samples expected to be collected during the sampling project is sixteen. This number includes four soil samples, one duplicate soil sample, and one background soil sample for a total of six soil samples. The total number of samples also includes a total of ten glass samples and one water sample. Due to variables that may be encountered in the field (e.g., no ponding water and/or piles selected for sampling), the number of sample matrixes within a sample type may be increased or decreased as needed based on the inspectors' information at the time of sampling.

Appendix A – Project Organization Chart – This appendix is not being modified.

Appendix B – This appendix is being modified to eliminate the first aerial photo of the Northbrook site (no longer of interest), and to include an aerial photo/map of the G-Street Site that includes the elementary school and park where the background sample will be taken.

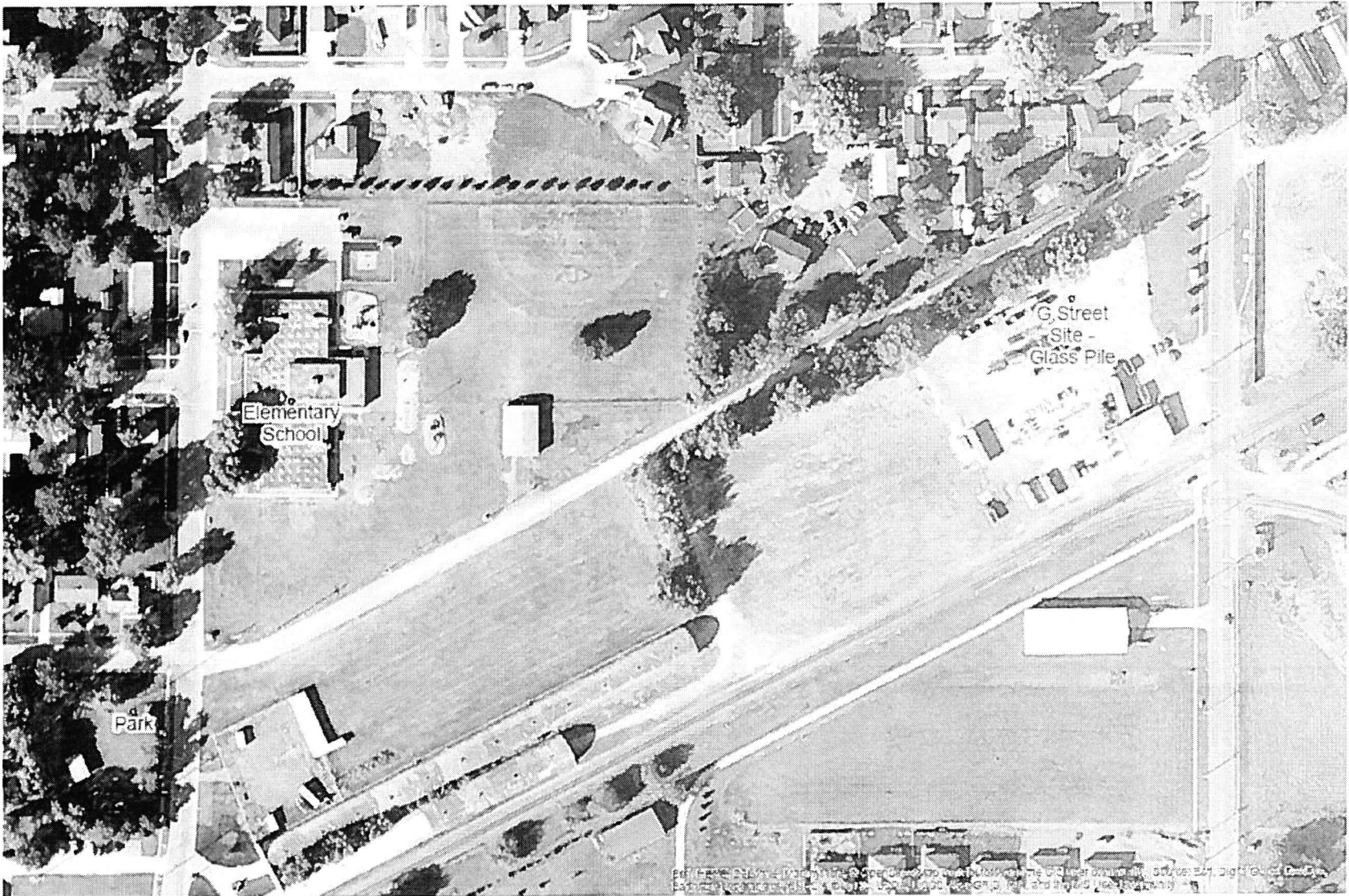
Appendix C – Equipment List - This appendix is being replaced with the one included in the addendum.

Appendix D – Sample Summary Table - This appendix is being replaced with the one included in the addendum.

Appendix E – There is no change to this Appendix.



## APPENDIX B – FACILITY LAYOUT



## APPENDIX C - EQUIPMENT LIST (as applicable)

Part of the equipment list is stated in the referenced ERTs and a more detailed list will be developed prior to mobilization after the ASR has been submitted and accepted by the ENST Lab.

### Safety Equipment to include:

- Tyvek Gear
- Protective Gloves
- Steel Toe Boots
- Safety Glasses
- Hard Hat
- Coated Kevlar gloves
- Latex or nitrile gloves large enough to go over the kevlar gloves

### Sampling Equipment:

- 1 -Stainless Steel Shovel and/or Hand Shovel (Trowel)
- 10 -Stainless Steel Spoons
- 22 -8-oz. Glass Jars with Teflon lids
- 35 - Plastic bags to put sample jars
- 2 Unpreserved plastic containers to be used for scooping water
- 2 Containers for Water samples
- 80 Freezer weight, zipper style plastic bags for glass samples
- 10 -Aluminum Pans
- 2 -Ice Chests
- 2 -Scissors
- 1 Roll -Large Clear Tape
- 1 Roll -Duct Tape
- 4 -Custody Seals
- 3 -Large Plastic Bags (for each ice chest and trash)
- 4 -Chain-of-Custody Forms (With Protective Plastic Bag)
- Ice - Enough to fill coolers
- bubble wrap bags or foam - Enough to wrap glass 8 jars
- Distilled Water
- Deionized Water (organic/analyte free)
- Alconox Soap
- Paper Towels
- Camera
- Measuring Tape (50 Ft)
- Field Sheets and Tags
- Waterproof Marker
- Field Bound Notebook

### Other Equipment:

XRF Unit and accessories (case, extra batter, etc.)

**APPENDIX D - SAMPLE SUMMARY TABLE FOR FACILITIES A, B, AND C**  
**(Subject to change after ASR submitted to ENST Lab, which will be documented in the inspection report; )**

Location and Type of Sample	Sample Matrix	Estimated Number of Samples	Container Type	Preservation Method	Constituents of Interest	Analytical Method (SW-846)	Levels of Interest
Glass	Glass	Up to 10 samples, including 1 duplicate, and 1 background sample, and 1 sample each at 5 sites, and 3 samples at the G-Street location	1-8 oz. jar	Cool to 4°C	Total Metals (including Hg) and TCLP Metals	6010 (SOP 3122.03), 7473 (SOP 3121.23), and 1311 (SOP 3171.01)	- Method Detection Limit (MDL) - regulatory threshold found at 40 CFR 261 Subpart C (5 mg/L)
Soils	Soils	Up to 6, includes 1 duplicate and 1 background	1-8 oz. jar	Cool to 4°C	Total Metals (including Hg) and TCLP Metals	6010 (SOP 3122.03), 7473 (SOP 3121.23), and 1311 (SOP 3171.01)	- Method Detection Limit (MDL) - regulatory threshold found at 40 CFR 261 Subpart C (5 mg/L)
Water	Water	Up to 1	1, 8 oz jar	Cool to 4°C Preserve as required by the method and the laboratory	Total Metals (including Hg) and TCLP Metals (if enough volume is present)	6010 (SOP 3122.03), 7473 (SOP 3121.23), and 1311 (SOP 3171.01)	- Method Detection Limit (MDL) - regulatory threshold found at 40 CFR 261 Subpart C (5 mg/L)

Quality Assurance Project Plan  
for  
RCRA Compliance Sampling  
at

Recycletronics  
3313 Northbrook Drive  
Sioux City, IA 51105

And

Lin-Du LLC  
2301 G Street  
South Sioux City, NE

And

Recycletronics  
1230 Steuben Street  
Sioux City, Iowa

Prepared by  
Rebecca Wenner  
November 2016

  
Rebecca Wenner, RCRA QAPP Co-Coordinator

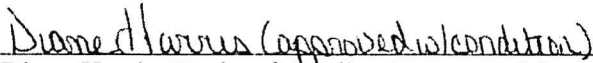
11/18/2016  
Date

  
Michael J. Martin, RCRA QAPP Co-Coordinator

11/16/2016  
Date

  
Mary Goetz, EPA AWMD/WEMM Branch Chief

16 Nov 16  
Date

  
Diane Harris, Regional Quality Assurance Manager  
Data Integrations and Support Operations Branch

11/28/2016  
Date

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Appendix A - Project Organization Chart

Appendix B - Facility Layout

Appendix C - Equipment List

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### A3. DISTRIBUTION LIST

EPA Region VII: Michael J. Martin, RCRA Inspector  
Rebecca Wenner, AWMD/WEMM Compliance Officer  
Mary Goetz, AWMD/WEMM Branch Chief  
Jeff Field, ENST/EFCB Chief  
Diane Harris, Regional Quality Assurance Manager  
Margie St. Germain, Regional Laboratory Branch Chief

### A4. PROJECT/TASK ORGANIZATION

This Resource Conservation and Recovery Act (RCRA) sampling project will be conducted by US Environmental Protection Agency (EPA) Region 7 (R7) for the RCRA compliance program. EPA will be responsible for all activities. The Project Organizational Chart is included as Appendix A. The individuals directly involved with this sampling project and their specific responsibilities are outlined below.

**Michael J. Martin, RCRA Inspector and AWMD/WEMM Compliance Officer** will serve as project manager for this sampling project. As project manager, the inspector will direct, coordinate, and implement the field sampling activities/operations, except select sampling locations. In addition, the project manager will review, document and ensure that the sampling activity is conducted in accordance with this QAPP. The project manager will be responsible for providing the Environmental Sciences and Technology Division (ENST) the site-specific Analytical Services Request (ASR) form. The project manager will ensure QAPP implementation and document any deviations from this QAPP. The project manager will also participate in the sample collection process, with the additional assistance of one or more Environmental Field Compliance Branch (EFCB) Inspectors and/or Air and Waste Management Division/Waste Enforcement and Materials Management Branch (AWMD/WEMM) Compliance Officers. These individuals will be designated as project assistants. He is responsible for review of this QAPP and to ensure that it meets the needs of the RCRA Compliance Program. The project manager will inform EFCB personnel of changed project data needs.

**Rebecca Wenner, RCRA Inspector and AWMD/WEMM Compliance Officer**, or her designee, will serve as co-project manager for this sampling project. She is responsible for authoring and revising this QAPP. She will select all locations where program specific samples are to be collected during this field activity and take all Photos. She is also responsible for providing available site specific information prior to this sampling project, and for informing the ENST/EFCB Manager and/or the project manager of any changed project data needs.

**Mary Goetz, EPA WEMM Branch Chief**, or her designee, is responsible for the overall coordination and decisions for the sampling project and for assigning project managers/assistants. She will be responsible for overall targeting and scheduling of this facility inspection covered by this QAPP. Assigns the WEMM Compliance Officer to this facility that is scheduled for the inspection. Will also review this QAPP to ensure that it meets the data needs of WEMM compliance program. Also, responsible for providing available site specific information prior to this sampling project, and for informing the ENST/EFCB Manager and/or project manager of any changed project data needs.



**Diane Harris, EPA Regional Quality Assurance Manager** is responsible for the review and approval of this QAPP and any subsequent revisions in terms of quality assurance aspects.

**Margie St. Germain, EPA Regional Laboratory Branch Chief** is responsible for the coordination and scheduling of lab analyses, data review and data validation.

## **A5. PROBLEM DEFINITION/BACKGROUND**

According to the May 23, 2016 Compliance Evaluation Inspection (CEI) report:

Recycletronics was originally organized as a not-for-profit in 1990 as Disabled Veterans at Work. It was reorganized in 2011 as a for-profit corporation and moved into the present facility in 2013. Recycletronics collects used electronic equipment (computer monitors, computers, printers, and televisions) from landfills, and by staging recycling events in various cities. Homeowners and businesses can drop off their used electronic equipment for recycling at these events. The used electronic equipment is then disassembled by Recycletronics and the components [wiring, circuit boards, cathode ray tubes (CRT), monitors, and cases] are sorted for recycling. Recycletronics processes CRTs for recycling by separating leaded glass from other components, this is done by taking CRTs to the glass room to separate into leaded and unleaded glass debris. All other electronic equipment is bundled on pallets and sold as-is to brokers for reuse or recycling.

Recycletronics is located at 3313 Northbrook Drive, Sioux City, Iowa, in Woodbury County (Facility A). A satellite facility of Recycletronics, referred to as Lin-Du LLC (Lin-Du), is located at 2301 G Street, South Sioux City, Nebraska (Facility B). The Iowa Department of Natural Resources (IDNR) told EPA that in August, 2016, Recycletronics may have moved some or all of their operations to a third location, 1230 Steuben Street, Sioux City, Iowa (Facility C).

The first Compliance Evaluation Inspection (CEI) conducted by EPA and/or an EPA contractor at Facility A on June 16, 2015. A subsequent CEI was conducted on May 23, 2016. On April 17, 2016 and May 23, 2016, an EPA contractor conducted CEIs at both Facility A and Facility B. To date, no CEI has been conducted at Facility C. During each CEI, facility representatives have claimed that computer problems prevented them from producing any files or records. During the CEIs, inspectors documented large piles of glass on the ground at Facility B, and multiple containers of glass in poor condition at both Facility A and Facility B. An inspector also identified multiple containers of broken electronic equipment in poor condition, stored outdoors on the ground.

A Request for Information under the authority of Section 3007 of RCRA was received by the owner of Recycletronics on February 22, 2016. To date, no response has been received by EPA.

As a result of the CEIs, EPA has found that the facility is in violation of the following:

1. Title 40 Code of Federal Regulations (40 CFR) 262.34(a)(4) referencing 40 CFR 265.31 – Failure to manage a facility to minimize the possibility of a release.
  - a. (cited in the December 1, 2015 EPA LOW) – Facility A - During the July 16, 2015 CEI, the inspector observed containers of electronic equipment awaiting processing stored outdoors (Photos 7 through 14). These containers were open, had the contents overflowing the containers, and many of the containers were in poor condition and were not weather



proof. Around these containers the inspector observed broken plastic and metal scrap on the concrete pad and on the unpaved ground (Photos 15 through 18).

- b. (Not yet cited) – Facility B - During the April 17, 2016 CEI, the inspector observed a large pile of crushed glass on the concrete pad (Photos 1 to 6).

Some of the glass was in open totes, the remainder was open and sitting directly on the concrete pad. The inspector also observed that the north and east sides of pile were in standing water (Photos 7 to 13).

2. Title 40 CFR 261.39(b)(2)(i), Failure to receive broken or intact CRTs and to manage glass removed from CRT monitors within a building with a roof, floor, and walls

- a. Facility A - At the time of the July 16, 2015, and the May 23, 2016, inspections, containers of electronic equipment had been received and were awaiting processing, were being stored outdoors (Photos 7 through 14). These containers were open, had the contents overflowing the containers, and many of the containers were in poor condition and were not weather proof.

- b. Facility B - During the April 17, 2016, and May 23, 2016, inspections, the EPA inspector observed a large pile of crushed glass removed from CRTs were stored outdoors, on a concrete pad (Photos 1 to 6). Some of the glass was in open totes, the remainder was open and sitting directly on the concrete pad. The inspector also observed that the north and east sides of pile were in standing water (Photos 7 to 13).

Additional violations may be cited if the facility is found to be speculatively accumulating hazardous materials.

Sampling is necessary to determine if the glass piles, soil, and other wastes at the three sites contain hazardous constituents, including whether or not the glass is leaded glass. The primary constituents of concern at all three sites is heavy metals, primarily lead, cadmium, chromium, and mercury.

#### **A6. PROJECT/TASK DESCRIPTION**

The purpose of this sampling project is to determine whether (1) the facility is in compliance with RCRA regulations, (2) the facility is not in compliance with RCRA, which will require compliance/enforcement response to return the facility to compliance, or (3) the facility must further monitor and analyze its waste streams, waste management units, soils, sediment, and/or storm/surface water. This will involve the following activities:

- EPA conducting current site assessments by completing RCRA compliance evaluation inspections; and
- EPA determining waste inventory on-site and sampling suspected hazardous waste for verification of non-hazardous waste determinations.

To make these determinations, EPA will compare the resulting sampling data to the applicable regulatory levels to identify the presence and not the extent of the hazardous constituents of concern.

Waste and environmental samples will be collected at the facility. Media sampled may include

solid wastes, soils, and/or sediment.

**Solid waste samples** will be collected to determine the accuracy of the facility's waste determinations and if hazardous constituents are being managed in compliance with RCRA regulations. These selected areas will be as stated in Section B1.2. Waste samples may be comprised of any exposed (i.e., open to the elements and/or accessible to humans) electronic wastes and/or electronic waste components that are accumulated in drums, boxes, and/or other containers, or in piles and/or spilled onto the ground. Typical analyses expected will include the following:

- Total metals (including mercury) – The total metals analytical data will be used to determine if metals are present in the waste and/or media. This will include being used to identify the presence and not the extent of the hazardous constituents of concern. Therefore, there will be no action levels, although any detection of these constituents will be used to make these determinations.
- TCLP metals – In the event that any of the analytical results for the total analyses exceed the regulatory threshold by a factor of 20, these samples will be analyzed for TCLP metals. The TCLP results will be compared to the RCRA TCLP regulatory levels found in Table 1 of 40 CFR 261 Subpart C. Any waste exceeding a regulatory threshold will be classified as a hazardous waste.

**Soil and sediment samples** will be collected from selected waste/spill areas. This sampling will be conducted to determine if any hazardous constituents and/or pollutants have been released on-site, and to determine if the soil itself has been contaminated to such a level that it requires management as a hazardous waste. These selected areas will be as stated in Section B1.2. Typical analyses expected will include the following:

- Total metals (including mercury) – The total metals analytical data will be used to determine if metals are present in the soil and/or sediment. This will include being used to identify the presence and not the extent of the hazardous constituents of concern. It will be compared to any available soil background sample data as explained in Section A7.
- TCLP metals – In the event that any of the analytical results for the total analyses exceed the regulatory threshold by a factor of 20, these samples will be analyzed for TCLP metals. The TCLP results will be compared to the RCRA TCLP regulatory levels found in Table 1 of 40 CFR 261 Subpart C. Any waste exceeding a regulatory threshold will be classified as a hazardous waste.

The background soil samples will be collected from a nearby unaffected area (such as a non-adjacent public park) and analyzed for total metals.

This sampling project is scheduled to begin during the first quarter (preferably beginning of December) of FY2017. All samples will be delivered to the EPA laboratory upon return from the sampling project. EPA R7 SOP No. 2334.21 "Shipping Ambient and NPDES Water Samples to the EPA Region 7 Laboratory" will be followed where applicable.

A complete equipment list is provided as Appendix C. Appendix D indicates the sample

containers required during this project. Personnel requirements are listed in Section A8 of this QAPP.

## **A7. DATA QUALITY OBJECTIVES AND CRITERIA FOR MEASUREMENT DATA**

The project data quality objective is to provide valid data of known and acceptable quality for the wastes, soils, and sediment. Analytical data will be compared to background and regulatory levels as specified below:

- TCLP constituents will be compared to regulatory thresholds – Any sample analysis that exceeds the regulatory level is classified as a hazardous waste.
- Total metals data will be used to identify the presence and not the extent of the hazardous constituents of concern or pollutants.
- Soil sample data will be compared against the background sample data. A release of contaminants (with the exception of metals) to the soil will be deemed to have occurred if the sample concentration level exceeds background, assuming reasonable background levels. A release of metal contaminants to the soil will be deemed to have occurred if the sample concentration level exceeds a background concentration level by more than a factor of two, assuming reasonable background levels.

### **A7.1 Data Quality Indicators**

A sample summary table which includes the location and type of each sample, sample matrix, estimated number of samples, container type, preservation method, constituents of interest, analytical method, and level of interest is included as Appendix D. The data quality indicators to be measured are identified below.

#### **A7.1.1. Precision and Accuracy**

The goals for analytical precision and accuracy are described in R7 ENST Standard Operating Procedures (SOP) and specified in the analytical methods. If a contract laboratory is utilized, the contracted laboratory shall meet or exceed the goals for analytical precision and accuracy described in R7 ENST SOPs and the approved analytical methods.

Duplicate sample data will be utilized to assess precision. The acceptance limit for the precision assessed via field duplicate samples will be less than or equal to 50 percent relative percent difference.

No trip blank or preservative blanks will be utilized during this project as volatiles are not of interest at this site and preservatives will not be used because all samples will be solids.

Dedicated sampling equipment will be used where all possible. If decontamination is conducted of applicable sampling equipment, then a rinsate blank will be collected to assess decontamination procedures. The rinsate data will be compared to the sample data. If any constituents are detected, then the sampling data will be further investigated and the actions taken will be documented in the inspection report.

#### **A7.1.2. Representativeness**

Representativeness will not be an issue during the waste sampling as worst-case conditions are being determined, these worst-case conditions being that portions of the waste stream sampled would be a hazardous waste. Therefore, samples will be collected based on the inspectors' criteria from visually contaminated areas or areas most likely to contain the hazardous constituents of concern.

Representativeness will also not be an issue during the soil and sediment sampling as the data will be used to identify the presence and not the extent of the hazardous constituents of concern or pollutants. Therefore, samples will be collected based on the inspectors' criteria from visually contaminated areas or areas most likely to contain the hazardous constituents of concern or pollutants.

#### **A7.1.3. Completeness**

The completeness of the project will be assessed by comparing the number of sample results to the number of samples submitted for analysis. The completeness goal is 100 percent. Should the completeness goal not be met, the project manager will determine if additional sample collection is needed.

#### **A7.1.4. Comparability**

Comparability will be addressed by collecting, analyzing, and reporting the data as described in this document. It is anticipated that standard methods or EPA methods will be implemented. Analytical results for TCLP analysis should be reported in milligrams per liter (mg/L), the results for total analyses should be reported in milligrams per kilograms (mg/Kg) or micrograms per liter (ug/L), as appropriate.

### **A8. SPECIAL TRAINING REQUIREMENTS/CERTIFICATION**

#### **A8.1 Personnel**

Prior to conducting this sampling activity, each inspector will have completed at a minimum the following training:

- a. Hazardous Waste Operations (HAZWOPER) (40 hours).
- b. RCRA Program Training.
  1. Inspector Orientation (10 hours).
  2. Regulatory Framework (40 hours).
  3. RCRA Compliance Evaluation Inspections; 100 hours (30 hours must be on-the-job training with an experienced inspector), and at least two of these inspections must be at treatment, storage and disposal facilities.
- c. Participation in at least two (2) sampling activities conducted by an experienced inspector.
- d. Annual 8-hour OSHA Health and Safety Refresher Training.
- e. CPR certification.

In addition, each inspector will be provided with (or provided access to) the following reference

materials:

- a. EPA Region 7 Standard Operating Procedures.
- b. EPA inspection guidance manuals.
- c. Current edition of 40 CFR (260-299).
- d. State Hazardous Waste Regulations.
- e. Hazardous materials reference literature.
- f. SW-846.
- g. Historical collection of rule changes (from 1980).
- h. EPA Standard Safety Operating Guides.

All project managers and assistants will have equivalent safety and sampling training.

## **A9. DOCUMENTATION AND RECORDS**

This information is covered by the current versions of EPA R7 SOP Nos. 2410.01 "Analytical Data Management Procedures" and 2410.10 "Analytical Data Submission Package Contents & Review."

RCRA non-laboratory project records are maintained at the EPA Regional Records Center (RRC). It is the responsibility of the Records Information Manager at the RRC to maintain these records. At present time, RCRA non-laboratory project records are maintained according to EPA records retention and disposition schedule.

The RCRA Inspector will disseminate copies of the QAPP to the people listed in the distribution list (see Section A3) once it is approved. Any revisions to the QAPP will be numbered sequentially. It will be the responsibility of the EPA project manager to see that each person on the distribution list receives copies of any revisions.

All field narrative and details will be provided in the sampling inspection report.

## **B1. SAMPLING PROCESS DESIGN**

### **B1.1 Health and Safety**

The project leader and assistants must ensure that the sampling can be performed in accordance with accepted safety procedures. They should refer to the Health and Safety section of the applicable sampling SOP for unit or method specific guidance and to EPA PB92-963414, "Standard Operating Safety Guides," for additional guidance. In the event that the project leader and assistants have any reservations as to the safety of the sampling operations, no sampling will occur under this plan.

The primary safety hazards during this sampling activity will be from physical hazards, such as cuts from the primary waste, crushed glass, and possibly TCLP heavy metals (lead) dust. A safety survey will be conducted before any samples are collected (Appendix E). At the project leader's and assistants' judgement, taking into account the weather, the surrounding conditions, the facility's safety requirements, and the physical state of the waste streams, the project leader and assistants will determine the appropriate personal protective equipment (PPE) to be worn during the sampling event. Level D is expected to be worn. Level D clothing includes Tyvek gear, safety shoes, hard hat, safety glasses, and gloves.

## **B1.2 Samples**

### **B1.2.1 Waste Streams in Drums and/or other open containers**

It is expected that waste streams of interest, primarily crushed glass, will be generated and accumulated in drums or other open containers on-site (containers). The facility representatives are expected to have at a minimum, knowledge of how these waste streams were generated and what they consist of. Also, previous inspections have identified no risk of organics at the site. Therefore, no field monitoring instruments (i.e., organic vapor analyzers) will be used to screen the containers. The containers selected for sampling will be randomly selected based on the inspectors' criteria from the drums most likely to contain hazardous waste based on visual observations and/or based on process information (i.e., how and when it was generated, process changes, etc.) received by the facility representative during the inspection. Also, the containers selected for sampling are expected to be safely accessible and already open or the facility representatives are expected to open the selected containers. Therefore, no drum opening or moving equipment will be used.

The total number of container samples will be no more than six (6).

### **B1.2.2 Solid Waste Stream Spills and Piles**

It is expected that crushed glass generated at Facility A and possibly Facility C may be accumulated in distinctive waste piles at Facility B. Each pile is expected to contain crushed glass, but the consistency of that glass is unknown. Samples will be collected from the distinctive waste piles that are safely accessible and selected by the inspectors based on information provided by facility representatives during the inspection. For each distinctive pile selected, the sample will consist of one (1) composite sample of up to five (5) to 10 aliquots depending on size of the pile. The aliquots locations will be randomly selected based on the inspectors' criteria from the areas most likely to contain hazardous waste based on visual observations and/or based on process information received by the facility representative during the inspection.

If there are no distinctive piles (i.e., various waste placed into one large pile or impossible to determine what wastes are in which pile), then samples will be collected from the indistinctive waste piles that are safely accessible and selected by the inspectors. For each indistinctive pile selected, the sample will consist of up to three (3) grab samples depending on pile sizes. The grab sample locations will be randomly selected by the inspectors from the areas most likely to contain hazardous waste based on visual observations and/or based on process information received from the facility representative during the inspection.

The total number of waste stream pile samples will be no more than two (2).

### **B1.2.3 Soil**

Surface soil grab samples may also be collected from processing/operating areas, areas under solid waste spills, or visibly contaminated areas. The areas selected for sampling may also consist of surface soil samples collected from an area up to about 10 feet (in the direction of drainage flow) from waste piles, based on visible drainage paths observed. The number of samples collected from each selected area will consist of up to two (2) grab samples depending on size of the area.



The sample locations will be randomly selected based on the inspectors' criteria from the areas most likely to contain hazardous waste based on visual observations and/or based on process information received by the facility representative during the inspection. If no area is vacant or safely reachable, then the grab samples will be collected from randomly selected areas that are safely reachable and based on the inspectors' criteria from the areas most likely to contain hazardous waste based on visual observations and/or based on process information received from the facility representative during the inspection.

For this project, surface soil is defined as the top 0-2 inches of soil. The total number of surface soil samples selected for sampling will be up to three (3).

#### **B1.2.4 Background Soil**

One (1) surface soil background sample will be collected from an unaffected area on each site (Facility A, B, and C) where a soil sample is collected. If an unaffected area cannot be located on-site, a background sample will be collected from an unaffected area off-site. The total number of surface soil background samples will be up to three (3).

#### **B1.3. Waste Generated During Sampling**

If any hazardous or potentially hazardous waste is generated from these sampling procedures, it will be left at the site, if possible or double bagged, labeled, and returned to EPA.

#### **B1.4. Additional Design Information**

For this project, the inspectors shall complete a more detailed process design on-site, prior to conducting the sampling operations. The more detail process design shall consist of noting sample locations on the site sketch and photographing the sample locations. The inspectors will document any unusual site conditions or potential interferences regarding such. The inspectors shall document the sampling method and sampling equipment. The inspectors will also be responsible for correcting any problems that occur in the field.

The total number of samples expected to be collected and submitted for analysis under this plan, including duplicates is shown in Appendix D.

### **B2. SAMPLING METHODS REQUIREMENTS**

EPA will collect waste samples according to the rationale presented in Section B1 above. Samples will be collected in accordance with EPA R7 ENST SOPs. The EPA R7 SOPs applicable to sampling that may be conducted during the project include:

- SOP No. 2420.04 - Field Chain of Custody for Environmental Samples
- SOP No. 2420.05 - Identification, Documentation and Tracking of Samples
- SOP No. 2420.06 - Sample Container Selection, Preservation and Holding Times



- SOP No. 4231.2009 (ERT #2009) - Drum Sampling
- SOP No. 4231.2017 (ERT #2017) - Waste Pile Sampling
- SOP No. 4231.2012 (ERT #2012) - Soil Sampling
- SOP No. 4232.2016 - Sediment Sampling

## **B2.1. Sampling**

Drum Waste: Wastes of interest will consist of solids. They are expected to be accumulated in drums and/or 225-275 gallon plastic or cardboard containers. Therefore, the samples will be collected by following R7 ENST SOP No. 4231.2009 (ERT #2009) - Drum Sampling. EPA will collect the sample as discussed in Section B1 above. Samples will be collected using a stainless steel spoons, stainless steel shovels, and/or stainless steel hand shovels (trowels). A sample may also be collected by filling the sample container directly, or by filling the sample container by using a second decontaminated container. Samples will be homogenized in aluminum pie pans and placed into appropriately labeled 8 oz. glass sample containers. If any of the wastes consist of large pieces, the larger pieces will be broken with a stainless steel spoon or shovel prior to placement in the sample container. The samples will be collected from the top 0-6 inches of the container.

Waste Piles: The waste samples will be collected as discussed in Section B1 above in accordance with EPA R7 SOP No. 4231.2017 (ERT #2017) "Waste Pile Sampling" (the section addressing the collection of surface portion samples). Dedicated stainless steel spoons, shovels, and/or hand shovels will be used to collect the samples. Aliquots for the composite samples will be homogenized in aluminum pie pans and placed into appropriately labeled 8 oz. glass sample containers. The samples will be collected from the top 0-6 inches of the pile. If any of the wastes consist of large pieces, the larger pieces will be broken with a stainless steel spoon or shovel prior to placement in the sample container.

Surface Soils: The surface soil samples (including background sample) will be collected as discussed in Section B1 above in accordance with EPA R7 SOP No. 4231.2012 (ERT #2012) "Soil Sampling" (the section addressing the collection of surface soil samples). Stainless steel spoons, shovels, and/or hand shovels will be used to remove waste from the soil prior to sampling. Dedicated stainless steel spoons will be used to collect the samples. Aliquots for the composite samples will be homogenized in aluminum pie pans prior to placement in the sample containers. The samples will be collected from the top 0-2 inches of the soil.

Sediment Samples: Sediment grab samples will not be collected.

## **B2.2. Additional Requirements**

Sampling points will be identified in the field notes by their directional distance from landmarks that are likely to be preserved over time. The field observations will be recorded in a bound notebook and/or on the field sheets. Photos of sampling locations will be taken. The time of sample collection, sample location, sample depth, sample section size, number of aliquots, sampling method employed, and sample equipment used will be recorded on field sheets.

The estimated total number of samples expected to be collected during the sampling project is 14. This number includes 13 solid samples and one (1) duplicate. Due to variables that may be encountered in the field (e.g., no standing puddles and/or piles selected for sampling, liquid wastes consist of aqueous solutions, or no equipment is decontaminated), the number of sample matrixes within a sample type may be increased or decreased as needed based on the inspectors' information at the time of sampling.

### **B3. SAMPLE HANDLING AND CUSTODY REQUIREMENTS**

Sample containers, preservation, and holding times will be those found in R7 ENST SOP No. 2420.06, "Sample Container Selection, Preservation, and Holding Times." The samples will be conveyed to the ENST lab in ice chests on ice.

Chain-of-custody and field documentation will be in accordance with R7 ENST SOP No. 2420.04, "Field Chain-of-Custody for Environmental Samples" and R7 ENST SOP No. 2420.05 "Identification, Documentation, and Tracking of Samples," respectively. The time of collection, location, sample section size, number of aliquots, the sample depth, will be recorded on field sheets.

### **B4. ANALYTICAL METHODS REQUIREMENTS**

The samples will be analyzed by the EPA Laboratory in accordance with the methods and levels of interest listed in Appendix D. Routine laboratory turnaround is requested for this project.

### **B5. QUALITY CONTROL REQUIREMENTS**

Duplicate Samples: Duplicates will be collected during this sampling in accordance with the R7 ENST SOPs listed in Section B2.1. The duplicate samples will be utilized to assess variance of the total method including sampling and analysis. At least one duplicate per media (solid waste and soil) will be collected in accordance with the R7 ENST SOPs listed in Section B2.1. If more than 20 samples are collected of a media, additional duplicate samples will be collected at a rate of one duplicate sample per twenty samples for each media. The duplicates will be collected as a split sample for all analyses. As stated in Section A7.1.1, the duplicates will be evaluated using percent relative standard deviation (%RSD). It is calculated as  $\%RSD = 2(RANGE)/\{[SQRT(2)] \times (SUM)\} \times 100$ .

Rinsate Samples: Dedicated sampling equipment will be used whenever possible. When it is not possible, field equipment should be cleaned according to R7 SOP 4231.2006 (ERT #2006) "Sampling Equipment Decontamination." When cleaning field equipment is required, a piece of the field-cleaned equipment will be selected for collection of a rinse blank. After the selected piece of equipment has been cleaned, and prior to its being used for sampling, it will be rinsed with deionized (organic/analyte free) water. The rinsate will be collected in the sample container. One rinsate blank per day per type of sampling device cleaned will be collected.

Split Samples: Split samples will be offered to the facility representative and provided by EPA if requested.

PE Sample: No PE samples are planned for this project.

Laboratory quality control elements: Laboratory quality control elements, including spikes and

blanks, will be performed in accordance with the above-referenced analytical SOP and EPA Region 7 SOP No. 2430.12 "Regional Laboratory Quality Control Policy."

#### **B6. INSTRUMENT/EQUIPMENT TESTING, INSPECTION, AND MAINTENANCE REQUIREMENTS**

For the field instrumentation, the testing, inspection, and maintenance will be performed in accordance with the manufacturer's recommendations.

For the analytical instrumentation, the testing, inspection, and maintenance will be performed in accordance with the above-referenced analytical SOP and manufacturers recommendations.

#### **B7. INSTRUMENT CALIBRATION AND FREQUENCY**

For the field instrumentation, the calibration will be performed in accordance with the above referenced manufacturer's recommendations and R7 ENST SOP No. 2333.01 "Field Equipment Calibration and Maintenance."

For the analytical instrumentation, the calibration will be performed in accordance with the above-referenced analytical SOP and manufacturers recommendations.

#### **B8. INSPECTION/ACCEPTANCE REQUIREMENTS FOR SUPPLIES AND CONSUMABLES**

The Project Manager and Project Assistants will be responsible for inspecting sample containers before leaving for the field. Only new sample containers accompanied by the manufacturer's certification of pre-cleaning will be used. The sample containers will also be inspected for cracks, ill-fitting lids, and other obvious defects before use and will be discarded if defects are found to be present.

#### **B9. DATA ACQUISITION REQUIREMENTS FOR NON-DIRECT MEASUREMENTS**

No data will be used from other sources.

#### **B10. DATA MANAGEMENT**

Data management will be in accordance with R7 ENST SOP No. 2410.01 "Analytical Data Management Procedures." The sampling data will be analyzed (including compared as discussed in this QAPP) by the EPA project manager and included in the sampling inspection report. The sampling inspection report is the only data handling equipment and procedure that will be used to process, compile, and analyze data.

#### **C1. ASSESSMENTS AND RESPONSE ACTIONS**

Assessments and response concerning the analytical aspect of the project are addressed in the R7 ENST SOP No. 2430.12. The information covers examples of conditions indicating out-of-control situations, who is responsible for initiating the corrective actions, and what steps may be taken.

Due to the limited duration of each sampling project, no field assessment is planned for this activity due to the short time period of each project.



## **C2. REPORTS TO MANAGEMENT**

Once the project is complete and the resulting data obtained, the EPA project manager will prepare a final sampling inspection report. The report will include a summary of the EPA sampling activities performed during the project and the resulting EPA data (along with any statements about problems concerning data quality). The report will be submitted following the same procedures as a RCRA compliance evaluation inspection.

### **D1. DATA REVIEW, VALIDATION, AND VERIFICATION REQUIREMENTS**

The data will be peer reviewed by a qualified analyst and the lab manager as identified in EPA R7 SOP Nos. 2430.12. The EPA project manager will be responsible for overall validation and final approval of the data in accordance with project purpose and use of the data. The method SOPs and 2410.10 will also be followed by the Regional Laboratory for data review.

### **D2. DATA VALIDATION AND VERIFICATION METHODS**

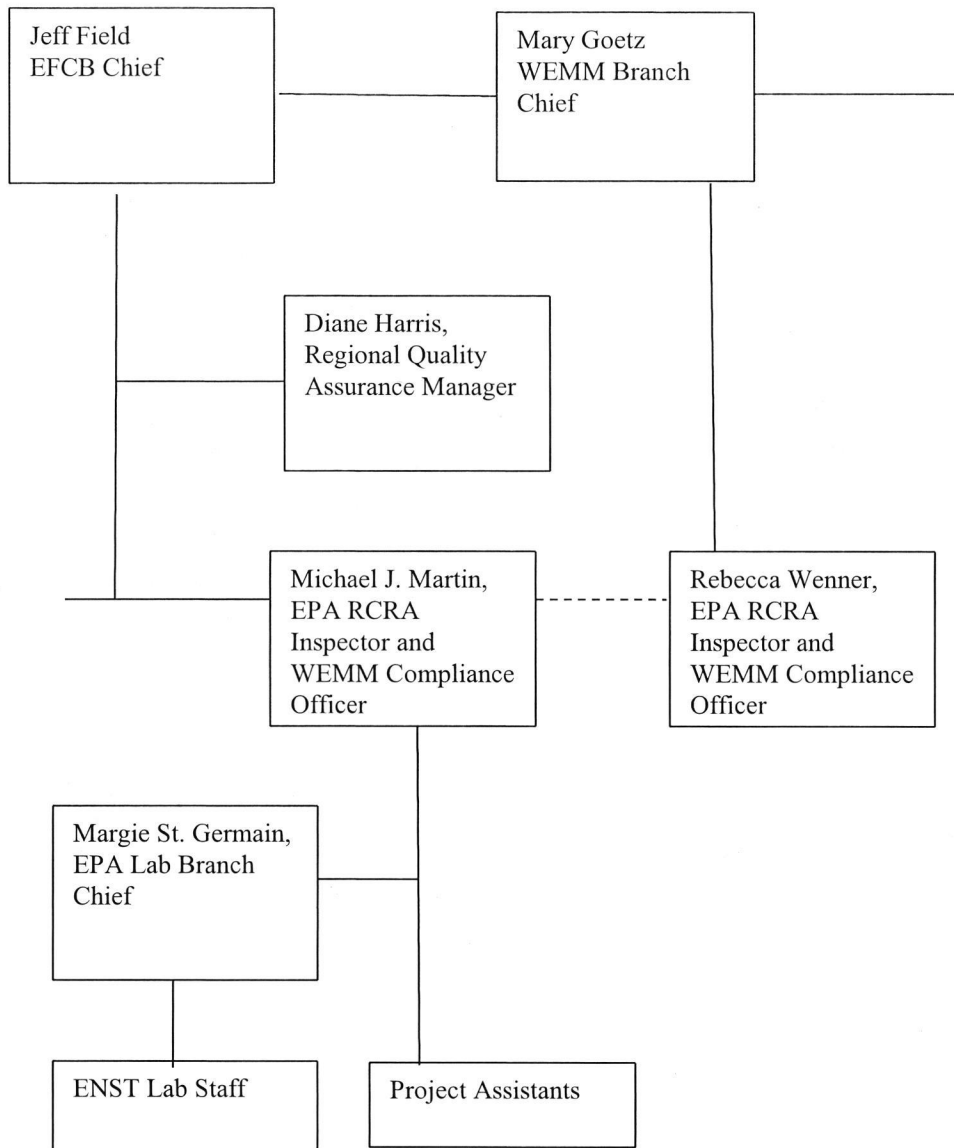
The data will be validated in accordance with R7 ENST SOP Nos. 2430.12. QC spot checks will be performed by the R7 laboratory following the frequency and criteria outlined in EPA R7 SOP No. 2430.06, "Periodic Internal Program Review of the Region 7 Laboratory."

The EPA project manager will perform the final review and approval of the data prior to it being entered into the LIMS system as valid. The EPA project manager will look at field duplicates and rinsate blanks to ensure they are acceptable. The acceptance limit for the precision assessed via field duplicate samples will be less than or equal to 50 percent relative standard deviation. If a target parameter is detected in the field blank at a concentration of one-tenth, or more, than the concentration found in a sample, the sample is rejected for that parameter. If the target parameter is detected in the field blank at a concentration of less than a tenth of that found in a sample, the sample value is used as is. The sampler does not subtract the field blank value from the sample value. The sampler also notes the positive blank under FINDINGS in his or her report. The EPA project manager will also compare the sample descriptions with the field sheets for consistency and will ensure that any anomalies in the data are appropriately documented.

### **D3. RECONCILIATION WITH USER REQUIREMENTS**

Once the data results are compiled, the EPA project manager will review the EPA field duplicates to determine if they fall within the acceptance limits as defined in this QAPP. Completeness will also be evaluated to determine if the completeness goal for this project has been met. If data quality indicators do not meet the project's requirements as outlined in this QAPP, then the data may be discarded and re-sampling may occur. The EPA project manager will evaluate the cause of the failure (if possible) and make the decision to discard the data and re-sample. If the failure is tied to the analysis, calibration and maintenance techniques will be reassessed as identified by the appropriate lab personnel. There will be no statistical analyses of the data beyond the calculation of completeness and percent RSD for field duplicates.

## Appendix A - PROJECT ORGANIZATION CHART



## APPENDIX B - FACILITY LAYOUT

Facility A - Recycletronics

3313 Northbrook Drive

Sioux City, IA

(From 5/23/2016 CEI)





Facility B - Lin-Du LLC  
2301 G Street  
South Sioux City, NE  
(From Google Earth)



Facility C - Recycltronics  
1230 Steuben Street  
Sioux City, IA  
(From Google Earth)



## APPENDIX C - EQUIPMENT LIST (as applicable)

Part of the equipment list is stated in the referenced ERTs and a more detailed list will be developed prior to mobilization after the ASR has been submitted and accepted by the ENST Lab.

### Safety Equipment to include:

- Tyvek Gear
- Protective Gloves
- Steel Toe Boots
- Safety Glasses
- Hard Hat

### Sampling Equipment:

- 1 -Stainless Steel Shovel and/or Hand Shovel (Trowel)
- 25 -Stainless Steel Spoons
- 35 -8-oz. Glass Jars with Teflon lids
- 35 - Plastic bags to put sample jars
- 10 -Aluminum Pans
- 2 -Ice Chests
- 2 -Scissors
- 1 Roll -Large Clear Tape
- 1 Roll -Duct Tape
- 1 Roll -Strapping Tape
- 4 -Custody Seals
- 3 -Large Plastic Bags (for each ice chest and trash)
- 4 -Chain-of-Custody Forms (With Protective Plastic Bag)
  - Ice - Enough to fill coolers
  - Foam - Enough to wrap glass jars
  - Distilled Water
  - Deionized Water (organic/analyte free)
  - Alconox Soap
  - Paper Towels
  - Camera
  - Measuring Tape (50 Ft)
  - Field Sheets and Tags
  - Waterproof Marker
  - Field Bound Notebook



**APPENDIX D - SAMPLE SUMMARY TABLE FOR FACILITIES A, B, AND C**  
**(Subject to change after ASR submitted to ENST Lab, which will be documented in the inspection report; )**

Location and Type of Sample	Sample Matrix	Estimated Number of Samples	Container Type	Preservation Method	Constituents of Interest	Analytical Method (SW-846)	Levels of Interest
Solid (Waste from drums, piles; Soils from process area, spill areas and background; and/or Sediment from pools/ditches)	- Solids - Crushed Glass - Other solid wastes	Up to 14 Includes 1 duplicate	1-8 oz. jar	Cool to 4°C	Total Metals (including Hg) and TCLP Metals	6010, 7471, and 1311	- Method Detection Limit (MDL) - regulatory threshold found at 40 CFR 261 Subpart C

# APPENDIX E - SITE SAFETY CHECK OFF LIST

## Site Safety Check Off List

### Before Sampling Activity

1. Activity Number \_\_\_\_\_ 2. Name(s) of EPA Personnel \_\_\_\_\_
  3. Facility Name \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_  
Address \_\_\_\_\_
  4. Activity Description: ☐ Facility Inspection ☐ Site Evaluation  
Sampling -- ☐ Air ☐ Water ☐ Drum ☐ Soil ☐ Waste Piles ☐ Residential ☐ Other
  5. Site Topography: ☐ Mountains ☐ Rivers ☐ Valley ☐ Hill ☐ Level  
☐ Rural ☐ Urban ☐ Suburban
  6. Incident Safety Plan: ☐ Region ☐ ERT ☐ Facility ☐ Not Developed  
☐ Reviewed ☐ Briefed  
Note if the plan is reviewed/briefed on site: \_\_\_\_\_  
Site Accessibility: ☐ Good ☐ Poor ☐ Fair
  7. Suspected Chemical(s) and pathway with source(s) involved  
(A) \_\_\_\_\_  
(B) \_\_\_\_\_  
(C) \_\_\_\_\_  
(D) \_\_\_\_\_
  8. Emergency Numbers, Locations and Estimated Time for Response to Arrive  
A. Fire \_\_\_\_\_  
B. Police \_\_\_\_\_  
C. Ambulance \_\_\_\_\_
  9. Is a communication device to summon emergency response readily available at the site?  
☐ Yes ☐ No
- 
10. Is an eye wash available? ☐ Yes ☐ No  
(Note that one should be carried with the inspector)
  11. ~~Is~~ the estimated time for the arrival of emergency response ~~greater~~ 20 minutes?  
☐ Yes ☐ No
  12. If any or all of the responses to 9, 10, or 11 above are No, sampling will not occur under this QAPP.
  13. Is Emergency Response Present on Site for First Aid? ☐ Yes ☐ No

14. Protective Level(s) Selected A B C D

If level "C" Identify Filter Cartridge(s) \_\_\_\_\_

If level "D" Justify, \_\_\_\_\_

Check Equipment Utilized

- ☐ Steel Toe Boots      ☐ Tyvek Suit      ☐ Tyvek Boot Covers      ☐ Safety Glasses/goggles  
☐ Hearing Protection      ☐ Hard Hat      ☐ Protective Gloves      ☐ Respirator

15. Do any sample locations require entry to areas identified as confined spaces (permitted or unpermitted) by the facility?

Do any of the sample locations confined space entry in the judgement of the project leader?

If Yes, sampling will not be performed under at these locations under this plan.

16. Do any of the sample locations require lockout, tagout in order to safely perform the sampling activities?

If Yes, sampling will not be performed under at these locations under this plan.

17. The inspector is referred to page 152 and 153 of the Standard Operating Safety Guidelines, for a list of agents that have specific guidelines. The inspector is should be aware that OSHA Standards for sampling, PPE, and record keeping, exist for these agents under certain conditions and/or at certain types of facilities. Asbestos, lead, benzene, inorganic arsenic, and vinyl chloride, formaldehyde, and ethylene oxide are among the more the more commonly encountered. The inspector is referred to the 29 CFR 1910.1000 Subpart Z, Toxic and Hazardous Substances for additional guidance.

After Sampling

14. Protective Level(s) Selected: ☐ Same as above ☐ A ☐ B ☐ C ☐ D

If level "C" Identify Filter Cartridge(s) \_\_\_\_\_

If level "D" Justify, \_\_\_\_\_

15. List possible chemical exposures

☐ Same as above

- A. \_\_\_\_\_  
B. \_\_\_\_\_  
C. \_\_\_\_\_  
D. \_\_\_\_\_

16. Approximate duration(s) of the exposure(s). \_\_\_\_\_



# APPENDIX E - SITE SAFETY CHECK OFF LIST

## Site Safety Check Off List

### Before Sampling Activity

1. Activity Number ASL 7449
2. Name(s) of EPA Personnel Mike Martin / Rebecca Werner
3. Facility Name Recycletronics City San City + Akron State SC, Iowa / SC, Nebraska, Akron, Texas  
Address Station Street, G Street, Fender Road, 160th Street, Highway 75 North, 4th Street (see report for full address)
4. Activity Description: ☒ Facility Inspection ☐ Site Evaluation  
Sampling -- ☐ Air ☐ Water ☐ Drum ☒ Soil ☐ Waste Piles ☐ Residential ☐ Other
5. Site Topography: ☐ Mountains ☐ Rivers ☐ Valley ☐ Hill ☐ Level  
☒ Rural ☒ Urban ☐ Suburban
6. Incident Safety Plan: ☐ Region ☐ ERT ☐ Facility ☒ Not Developed  
☐ Reviewed ☐ Briefed  
Note if the plan is reviewed/briefed on site: \_\_\_\_\_  
Site Accessibility: ☒ Good ☐ Poor ☐ Fair
7. Suspected Chemical(s) and pathway with source(s) involved  
(A) Leaded glass (broken glass)  
(B) \_\_\_\_\_  
(C) \_\_\_\_\_  
(D) \_\_\_\_\_
8. Emergency Numbers, Locations and Estimated Time for Response to Arrive  
A. Fire 911  
B. Police 911  
C. Ambulance 911
9. Is a communication device to summon emergency response readily available at the site?  
☒ Yes ☐ No
10. Is an eye wash available? ☐ Yes ☒ No  
(Note that one should be carried with the inspector)
11. Is the estimated time for the arrival of emergency response under 20 minutes?  
☒ Yes ☐ No
12. If any or all of the responses to 9, 10, or 11 above are No, sampling will not occur under this QAPP.
13. Is Emergency Response Present on Site for First Aid? ☒ Yes ☐ No

14. Protective Level(s) Selected A B C ☒ D

If level "C" Identify Filter Cartridge(s)

If level "D" Justify, Only gloves, hard hat, safety glasses, + safety boots needed.

Check Equipment Utilized

- ☒ Steel Toe Boots    ☒ Tyvek Suit    ☐ Tyvek Boot Covers    ☒ Safety Glasses/goggles  
☐ Hearing Protection    ☒ Hard Hat    ☒ Protective Gloves    ☐ Respirator

15. Do any sample locations require entry to areas identified as confined spaces (permitted or unpermitted) by the facility? No.

Do any of the sample locations confined space entry in the judgement of the project leader? No.

If Yes, sampling will not be performed under at these locations under this plan.

16. Do any of the sample locations require lockout, tagout in order to safely perform the sampling activities? No.

If Yes, sampling will not be performed under at these locations under this plan.

17. The inspector is referred to page 152 and 153 of the Standard Operating Safety Guidelines, for a list of agents that have specific guidelines. The inspector is should be aware that OSHA Standards for sampling, PPE, and record keeping, exist for these agents under certain conditions and/or at certain types of facilities. Asbestos, lead, benzene, inorganic arsenic, and vinyl chloride, formaldehyde, and ethylene oxide are among the more the more commonly encountered. The inspector is referred to the 29 CFR 1910.1000 Subpart Z, Toxic and Hazardous Substances for additional guidance.

After Sampling

14. Protective Level(s) Selected: ☒ Same as above    ☐ A    ☐ B    ☐ C    ☐ D

If level "C" Identify Filter Cartridge(s)

If level "D" Justify,

15. List possible chemical exposures

☒ Same as above

- A. \_\_\_\_\_  
B. \_\_\_\_\_  
C. \_\_\_\_\_  
D. \_\_\_\_\_

16. Approximate duration(s) of the exposure(s). 2 hrs at each of the 6 sites.



# CHAIN OF CUSTODY RECORD ENVIRONMENTAL PROTECTION AGENCY REGION VII

ACTIVITY LEADER(Print) <i>R. W. Werner</i>	NAME OF SURVEY OR ACTIVITY <i>#9449</i>	DATE OF COLLECTION <i>4-5 04 17</i>	SHEET <i>1 of 1</i>
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## CONTENTS OF SHIPMENT

SAMPLE NUMBER	TYPE OF CONTAINERS				VOA SET (2 VIALS EA)	SAMPLED MEDIA				RECEIVING LABORATORY REMARKS-OTHER INFORMATION (condition of samples upon receipt, other sample numbers, etc.)	
	CUBITAINER	BOTTLE				water	soil	sediment	dust		other
7449-1											
2											
3											
4											
5											
6											
103											
104											
105 FB											
106											
107											
201											

DESCRIPTION OF SHIPMENT <i>14</i> PIECE(S) CONSISTING OF _____ BOX(ES) <i>1</i> ICE CHEST(S): OTHER _____	MODE OF SHIPMENT ____ COMMERCIAL CARRIER _____ ____ COURIER _____ <input checked="" type="checkbox"/> SAMPLER CONVEYED _____ (SHIPPING DOCUMENT NUMBER)
---	--

PERSONNEL CUSTODY RECORD			
RELINQUISHED BY (SAMPLER) <i>Rebecca Werner</i>	DATE <i>4/6/07</i>	TIME <i>1051</i>	RECEIVED BY <i>Keith Rohly</i>
<input type="checkbox"/> SEALED <input checked="" type="checkbox"/> UNSEALED			<input type="checkbox"/> SEALED <input checked="" type="checkbox"/> UNSEALED
RELINQUISHED BY	DATE	TIME	RECEIVED BY
<input type="checkbox"/> SEALED <input checked="" type="checkbox"/> UNSEALED			<input type="checkbox"/> SEALED <input checked="" type="checkbox"/> UNSEALED
RELINQUISHED BY	DATE	TIME	RECEIVED BY
<input type="checkbox"/> SEALED <input checked="" type="checkbox"/> UNSEALED			<input type="checkbox"/> SEALED <input checked="" type="checkbox"/> UNSEALED



**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 201    QC Code: \_\_\_\_\_    Matrix: Water    Tag ID: 7449-201-G Street

Project ID: RWRECYCLE    Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City    State: Iowa  
Program: RCRA Enforcement

Location Desc: Water sample

Storet ID: \_\_\_\_\_    External Sample Number: \_\_\_\_\_

Expected Conc: \_\_\_\_\_ (or Circle One: Low Medium High)    Date    Time(24 hr)  
Latitude: \_\_\_\_\_    Sample Collection: Start: 04/04/17    14:50  
Longitude: \_\_\_\_\_    End: 04/04/17    15:05

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 1 Liter plastic bottle	5 mL of HNO <sub>3</sub> /L to pH<2	28 Days	1 Mercury in Water
1 - 1 Liter plastic bottle	HNO <sub>3</sub> acidify, 4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Water by ICP-AES
1 - 1 Liter plastic bottle	None	28 Days	1 TCLP Mercury in Water
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Water

**Sample Comments:**

(N/A)

2301 G Street

Water Sample

6 inches east of the pile

dark brown with sediment

M. H. H. H.  
7/4/17

Sample - 7449-201-G Street

Sample Collected By: RW/EPA

# Sample Collection Field Sheet

US EPA Region 7

Kansas City, KS

ASR Number: 7449 Sample Number: 103 QC Code: \_\_\_ Matrix: Solid Tag ID: 7449-103-*Early*

Project ID: RWRECYCLE Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City State: Iowa  
Program: RCRA Enforcement

Location Desc: Glass sample

Storet ID: \_\_\_\_\_ External Sample Number: \_\_\_\_\_

Expected Conc: \_\_\_\_\_ (or Circle One: Low Medium High) Date \_\_\_\_\_ Time(24 hr) \_\_\_\_\_

Latitude: \_\_\_\_\_

Sample Collection: Start: *04/04/17* *15:40*

Longitude: \_\_\_\_\_

End: *04/04/17* *15:48*

## Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

## Sample Comments:

(N/A) *Foundry Site (1300 Foundry Road)*  
*Glass pieces from pile*  
*Muddy/clear & red glass*  
*XRF = 17.5K Lead*  
*26 27.6K*  
*Mn 04/04/17 801ppm*  
*233.5K*  
*1822ppm*  
*263.0K*

Sample Collected By: RW/EPA

# Sample Collection Field Sheet

US EPA Region 7  
Kansas City, KS

ASR Number: 7449 Sample Number: 102 QC Code:      Matrix: Solid Tag ID: 7449-102-<sup>7</sup>G-Street

Project ID: RWRECYCLE Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City State: Iowa  
Program: RCRA Enforcement

Location Desc: Glass sample

Storet ID:                      External Sample Number:                     

Expected Conc: (or Circle One: Low Medium High) Date Time(24 hr)

Latitude:                Sample Collection: Start: 04/04/17 14:46

Longitude:                End: 04/04/17 14:49

## Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

## Sample Comments:

(N/A) 2301 G-Street  
Glass samples from pile  
Dark and red glass  
Sample# 7449-7-G street  
XRF = 158.7K + 227.1K Lead

Sample Collected By: RW/EPA



# Sample Collection Field Sheet

US EPA Region 7  
Kansas City, KS

ASR Number: 7449 Sample Number: 101 QC Code:      Matrix: Solid Tag ID: 7449-101-<sup>6</sup>~~101~~-FD

Project ID: RWRECYCLE Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City State: Iowa  
Program: RCRA Enforcement

Location Desc: Glass sample

Storet ID:                      External Sample Number:                     

Expected Conc:            (or Circle One: Low Medium High) Date            Time(24 hr)           

Latitude:        Sample Collection: Start: 04/04/17 14:11

Longitude:        End: 04/04/17 14:17

## Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

## Sample Comments:

(N/A)

2301 G Street  
16 Feet east from Sample 7449-S-G Street  
more sediment / less sandy  
dark brown soil  
XRF - 3758 ppm lead  
Sample 7449-6-FD

Sample Collected By: RW/EPA

# Sample Collection Field Sheet

US EPA Region 7  
Kansas City, KS

ASR Number: 7449 Sample Number: 6 QC Code: Matrix: Solid Tag ID: 7449-6-G Street

Project ID: RWRECYCLE Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City State: Iowa  
Program: RCRA Enforcement

Location Desc: Soil sample

Storet ID: External Sample Number:

Expected Conc: (or Circle One: Low Medium High) Date Time(24 hr)

Latitude: Sample Collection: Start: 04/04/17 14:11

Longitude: End: 04/04/17 14:17

## Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

## Sample Comments:

(N/A)

2301 G Street

16 Feet east From Sample 7449-5-G Street

More Sediment / less sandy  
dark brown soil

XRF - 3758 ppm Lead

Sample 7449-6-G Street

Sample Collected By: RW/EPA

# Sample Collection Field Sheet

US EPA Region 7

Kansas City, KS

ASR Number: 7449 Sample Number: 5 QC Code: \_\_\_ Matrix: Solid Tag ID: 7449-5-G Street

Project ID: RWRECYCLE Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City State: Iowa  
Program: RCRA Enforcement

Location Desc: Soil sample

Storet ID: \_\_\_\_\_

External Sample Number: \_\_\_\_\_

Expected Conc: (or Circle One: Low Medium High) Date Time(24 hr)

Latitude: \_\_\_\_\_

Sample Collection: Start: 04/04/17 13:57

Longitude: \_\_\_\_\_

End: 04/04/17 14:00

## Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

## Sample Comments:

(N/A)

2301 G Street

Dark brown/sandy + loose soil

12 Feet Northeast corner of the pile

7449-5-G Street (sample)

<sup>on 04/04/17</sup>  
XRF- ~~36~~ 3263 ppm Lead

Sample Collected By: RW/EPA



# Sample Collection Field Sheet

US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 4    QC Code: \_\_\_\_    Matrix: Solid    Tag ID: 7449-4-G Street

Project ID: RWRECYCLE    Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City    State: Iowa  
Program: RCRA Enforcement

Location Desc: Soil sample

Storet ID: \_\_\_\_\_ External Sample Number: \_\_\_\_\_

Expected Conc: \_\_\_\_\_ (or Circle One: Low Medium High)    Date    Time(24 hr)

Latitude: \_\_\_\_\_ Sample Collection: Start: 04/04/12    13:43

Longitude: \_\_\_\_\_ End: 04/04/12    13:46

## Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

## Sample Comments:

(N/A)

2301 G Street  
79 inches from the NW corner of the pile  
Loose/moist light brown soil

7449-4-G street (Sample)  
XRF - 531 ppm Lead

Sample Collected By: RW/EPA

**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 3    QC Code: \_\_\_\_    Matrix: Solid    Tag ID: 7449-3-background FB

Project ID: RWRECYCLE    Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City    State: Iowa  
Program: RCRA Enforcement

Location Desc: Soil sample

Storet ID: \_\_\_\_\_ External Sample Number: \_\_\_\_\_

Expected Conc: \_\_\_\_\_ (or Circle One: Low Medium High)    Date    Time(24 hr)

Latitude: \_\_\_\_\_ Sample Collection: Start: 04/04/17    12:45

Longitude: \_\_\_\_\_ End: 04/04/17    12:46

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

**Sample Comments:**

(N/A) Background (7449-3-Background)  
Raymond Park 24th & G Street  
Sioux City, NE  
Low moisture dark brown soil  
XRF = 21 ppm

Sample Collected By: RW/EPA

**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 2    QC Code:    Matrix: Solid    Tag ID: 7449-2-Slaben

Project ID: RWRECYCLE    Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City    State: Iowa  
Program: RCRA Enforcement

Location Desc: Soil sample

Storet ID:    External Sample Number:   

Expected Conc:    (or Circle One: Low Medium High)    Date    Time(24 hr)

Latitude:    Sample Collection: Start: 04/04/17    11:19

Longitude:    End: 04/04/17    11:21

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

**Sample Comments:**

(N/A)

Panel glass  
1220 Steuben  
Southwest side of the ramp (outside)  
Sample taken from 1 open box (Gaylord)  
7449 ST-Panel glass    Sample # 7449-2-Steuben  
XRF= 359ppm + 333ppm lead

Sample Collected By: RW/EPA



**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 1    QC Code: \_\_\_\_\_    Matrix: Solid    Tag ID: 7449-1-Steuben

Project ID: RWRECYCLE    Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City    State: Iowa  
Program: RCRA Enforcement

Location Desc: Soil sample

Storet ID: \_\_\_\_\_    External Sample Number: \_\_\_\_\_

Expected Conc: \_\_\_\_\_ (or Circle One: Low Medium High)    Date    Time(24 hr)

Latitude: \_\_\_\_\_    Sample Collection: Start: 04/04/17    11:10

Longitude: \_\_\_\_\_    End: 04/04/17    11:12

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

**Sample Comments:**

(N/A)

funnel glass - red + black  
1220 steuben

Southwest side of the ramp (outside)  
Sample taken from 1 open box (Gaylord)

7449-1ST lead (sample)    Sample # 7449-1-Steuben

XRF = 199.7K + 231.5K lead

Sample Collected By: RW/EPA

**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 104    QC Code: \_\_\_\_\_    Matrix: Solid    Tag ID: 7449-104-AK

**Project ID:** RWRECYCLE                      **Project Manager:** Rebecca Wenner  
**Project Desc:** Recycletronics - RCRA sampling  
**City:** Sioux City                              **State:** Iowa  
**Program:** RCRA Enforcement

**Location Desc:** Glass sample

**Storet ID:** \_\_\_\_\_

**External Sample Number:** \_\_\_\_\_

**Expected Conc:** \_\_\_\_\_ (or Circle One: Low Medium High)                      **Date**                      **Time(24 hr)**

**Latitude:** \_\_\_\_\_

**Sample Collection: Start:** 04/24/17

17:39

**Longitude:** \_\_\_\_\_

**End:** 04/24/17

17:40

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

**Sample Comments:**

(N/A)

*AKron, Iowa  
Glass Sample  
Black glass*

*Sample # 7449-104-AKron*

*XRF = 273.2K*

**Sample Collected By:** RW/EPA

**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 105    QC Code: \_\_\_\_    Matrix: Solid    Tag ID: 7449-105 Blank

**Project ID:** RWRECYCLE                      **Project Manager:** Rebecca Wenner  
**Project Desc:** Recycletronics - RCRA sampling  
**City:** Sioux City                                      **State:** Iowa  
**Program:** RCRA Enforcement

**Location Desc:** Glass sample

**Storet ID:** \_\_\_\_\_                      **External Sample Number:** \_\_\_\_\_

**Expected Conc:** \_\_\_\_\_ (or Circle One: Low Medium High)                      **Date**                      **Time(24 hr)**

**Latitude:** \_\_\_\_\_                      **Sample Collection: Start:** 04/04/12                      18:40  
**Longitude:** \_\_\_\_\_                      **End:** 04/04/12                      18:41

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

**Sample Comments:**

(N/A)

Blank

**Sample Collected By:** RW/EPA



**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 107    QC Code: \_\_\_\_    Matrix: Solid    Tag ID: 7449-107-SB

**Project ID:** RWRECYCLE                      **Project Manager:** Rebecca Wenner  
**Project Desc:** Recycletronics - RCRA sampling  
**City:** Sioux City                              **State:** Iowa  
**Program:** RCRA Enforcement

**Location Desc:** Glass sample

**Storet ID:** \_\_\_\_\_                      **External Sample Number:** \_\_\_\_\_

**Expected Conc:** \_\_\_\_\_ (or Circle One: Low Medium High)                      **Date**                      **Time(24 hr)**  
**Latitude:** \_\_\_\_\_                      **Sample Collection: Start:** 04/05/17                      13:42  
**Longitude:** \_\_\_\_\_                      **End:** 04/05/17                      13:50

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

**Sample Comments:**

(N/A)

Scandinavian Bldg.  
red glass  
XRF = 194.1K + 218.7K (Lead)

**Sample Collected By:** RW/EPA

**Sample Collection Field Sheet**  
US EPA Region 7  
Kansas City, KS

ASR Number: 7449    Sample Number: 106    QC Code: \_\_\_\_\_    Matrix: Solid    Tag ID: 7449-106-FM

Project ID: RWRECYCLE    Project Manager: Rebecca Wenner  
Project Desc: Recycletronics - RCRA sampling  
City: Sioux City    State: Iowa  
Program: RCRA Enforcement

Location Desc: Glass sample

Storet ID: \_\_\_\_\_

External Sample Number: \_\_\_\_\_

Expected Conc: \_\_\_\_\_ (or Circle One: Low Medium High)    Date    Time(24 hr)

Latitude: \_\_\_\_\_

Sample Collection: Start: 04/05/12    11:30

Longitude: \_\_\_\_\_

End: 04/05/12    11:34

**Laboratory Analyses:**

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	28 Days	1 Mercury in Soil or Sediment
1 - 8 oz glass	4 Deg C	180 Days	1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES
1 - 8 oz glass	4 Deg C	180 Days	1 TCLP Metals in Soil
1 - 8 oz glass	None	28 Days	1 TCLP Mercury in Soil
0 -	4 Deg C	0 Days	1 Percent Solid

**Sample Comments:**

(N/A)

*Feed Mill site*

*black + red coated glass*

*XRF = 280.9K + 267.6K (Lead)*

*Sample 7449-106-FM*

Sample Collected By: RW/EPA

**United States Environmental Protection Agency  
Region 7  
300 Minnesota Avenue  
Kansas City, KS 66101**

**Date:** 04/21/2017

**Subject:** Transmittal of Sample Analysis Results for ASR #: 7449

Project ID: RWRECYCLE

Project Description: Recycletronics - RCRA sampling

**From:** Margaret E.W. St. Germain, Chief  
Laboratory Technology & Analysis Branch, Environmental Sciences & Technology Division

**To:** Rebecca Wenner  
WEMM/AWMD

Enclosed are the analytical data for the above-referenced Analytical Services Request (ASR) and Project. The Regional Laboratory has reviewed and verified the results in accordance with procedures described in our Quality Manual (QM). In addition to all of the analytical results, this transmittal contains pertinent information that may have influenced the reported results and documents any deviations from the established requirements of the QM.

Please contact us within 14 days of receipt of this package if you determine there is a need for any changes. Please complete the Online ASR Sample/Data Disposition and Customer Survey for this ASR as soon as possible. The process of disposing of the samples for this ASR will be initiated 30 days from the date of this transmittal unless an alternate release date is specified on the Online ASR Sample/Data Disposition and Customer Survey.

If you have any questions or concerns relating to this data package, contact our customer service line at 913-551-5295.

Enclosures

cc: Analytical Data File.

**Project Manager:** Rebecca Wenner**Org:** WEMM/AWMD**Phone:** 913-551-7644**Project ID:** RWRECYCLE**QAPP Number:** ADDENDUM IN REVIEW.**Project Desc:** Recycletronics - RCRA sampling**Location:** Sioux City**State:** Iowa**Program:** RCRA Enforcement**Purpose:** Enforcement**GPRA PRC:** 302DA1

Pb concentrations in soil and glass.

PM has noted that this is a RCRA administrative ASR and not a CI ASR.  
Per RWenner on 4/6/17 that this ASR is not part of a litigation hold at this time.

### Explanation of Codes, Units and Qualifiers used on this report

**Sample QC Codes:** QC Codes identify the type of sample for quality control purpose.

**Units:** Specific units in which results are reported.

\_\_\_ = Field Sample

FB = Field Blank

FD = Field Duplicate

mg/L = Milligrams per Liter

% = Percent

mg/kg = Milligrams per Kilogram

ug/L = Micrograms per Liter

**Data Qualifiers:** Specific codes used in conjunction with data values to provide additional information on the quality of reported results, or used to explain the absence of a specific value.

(Blank)= Values have been reviewed and found acceptable for use.

U = The analyte was not detected at or above the reporting limit.

O = Parameter not analyzed.

K = The identification of the analyte is acceptable; the reported value may be biased high. The actual value is expected to be less than the reported value.



ASR Number: 7449

## Sample Information Summary

04/21/2017

Project ID: RWRECYCLE Project Desc: Recycletronics - RCRA sampling

Sample No	QC Code	Matrix	Location Description	External Sample No	Start Date	Start Time	End Date	End Time	Receipt Date
1 - ___		Solid	1220 Steuben funnel glass sample		04/04/2017	11:10	04/04/2017	11:12	04/06/2017
2 - ___		Solid	1220 Steuben panel glass sample		04/04/2017	11:19	04/04/2017	11:21	04/06/2017
3 - ___		Solid	Background soil sample		04/04/2017	12:45	04/04/2017	12:46	04/06/2017
4 - ___		Solid	2301 G Street soil sample (79" NW corner of pile)		04/04/2017	13:43	04/04/2017	13:46	04/06/2017
5 - ___		Solid	2301 G Street soil sample (12' NE center of pile)		04/04/2017	13:57	04/04/2017	14:00	04/06/2017
6 - ___		Solid	2301 G Street soil sample (16' E from sample 5)		04/04/2017	14:11	04/04/2017	14:17	04/06/2017
6 - FD		Solid	2301 G Street soil sample (16' E from sample 5)		04/04/2017	14:11	04/04/2017	14:17	04/06/2017
7 - ___		Solid	2301 G Street glass sample		04/04/2017	14:46	04/04/2017	14:49	04/06/2017
103 - ___		Solid	Foundry site glass sample		04/04/2017	15:40	04/04/2017	15:48	04/06/2017
104 - ___		Solid	Akron, IA glass sample		04/04/2017	17:39	04/04/2017	17:40	04/06/2017
105 - FB		Solid	Blank glass sample		04/04/2017	18:40	04/04/2017	18:41	04/06/2017
106 - ___		Solid	Feed Mill site glass sample		04/05/2017	11:30	04/05/2017	11:34	04/06/2017
107 - ___		Solid	Scandinavian bldg. glass sample		04/05/2017	13:42	04/05/2017	13:50	04/06/2017
201 - ___		Water	2301 G Street water sample		04/04/2017	14:50	04/05/2017	15:05	04/06/2017

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**Analysis      Comments About Results For This Analysis**

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## 1    Mercury in Soil or Sediment

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3121.23D**Basis:** Dry**Samples:** 1-\_\_      2-\_\_      3-\_\_      4-\_\_      5-\_\_      6-\_\_      6-FD  
                 7-\_\_      103-\_\_      104-\_\_      105-FB      106-\_\_      107-\_\_**Comments:**

## 1    Percent Solid

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3142.9H**Basis:** N/A**Samples:** 1-\_\_      2-\_\_      3-\_\_      4-\_\_      5-\_\_      6-\_\_      6-FD  
                 7-\_\_      103-\_\_      104-\_\_      105-FB      106-\_\_      107-\_\_**Comments:**

(N/A)

## 1    TCLP Mercury in Soil

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3121.23D applied to TCLP extracts**Basis:** N/A**Samples:** 1-\_\_      2-\_\_      3-\_\_      4-\_\_      5-\_\_      6-\_\_      6-FD  
                 7-\_\_      103-\_\_      104-\_\_      105-FB      106-\_\_      107-\_\_**Comments:**

## 1    TCLP Metals in Soil

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3122.3F TCLP**Basis:** N/A**Samples:** 1-\_\_      2-\_\_      3-\_\_      4-\_\_      5-\_\_      6-\_\_      6-FD  
                 7-\_\_      103-\_\_      104-\_\_      105-FB      106-\_\_      107-\_\_**Comments:**

## 1    Total Metals Analysis of TCLP Metals in Soil by ICP-AES

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.

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**Analysis      Comments About Results For This Analysis**

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**Method:** EPA Region 7 RLAB Method 3122.3F**Basis:** Dry**Samples:** 1-\_\_      2-\_\_      3-\_\_      4-\_\_      5-\_\_      6-\_\_      6-FD  
                 7-\_\_      103-\_\_      104-\_\_      105-FB      106-\_\_      107-\_\_**Comments:**

## 1    Mercury in Water

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3121.23D**Samples:** 201-\_\_**Comments:**

(N/A)

## 1    TCLP Mercury in Water

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3121.23D applied to TCLP extracts**Samples:** 201-\_\_**Comments:**

The results for this TCLP analysis of sample 201 was K-coded at the RCRA TCLP action level of the analytes. The analyses of the total analytes in these samples determined that the RCRA action level could not have been exceeded for any of the TCLP analytes.

## 1    TCLP Metals in Water

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3122.3F TCLP**Samples:** 201-\_\_**Comments:**

The results for this TCLP analysis of sample 201 were O-coded, as there were not enough solids collected on the filter (<0.5% solids). Therefore, the liquid is considered the extract and the solid does not need to be tumbled (i.e. TCLP is not needed). The total results from the liquid sample (Met T TCLP W.3F) are the TCLP results.

## 1    Total Metals Analysis of TCLP Metals in Water by ICP-AES

**Lab:** Region 7 EPA Laboratory - Kansas City, Ks.**Method:** EPA Region 7 RLAB Method 3122.3F**Samples:** 201-\_\_**Comments:**

**ASR Number:** 7449**RLAB Approved Sample Analysis Results****04/21/2017****Project ID:** RWRECYCLE**Project Desc:** Recycletronics - RCRA sampling

Analysis/ Analyte	Units	1-__	2-__	3-__	4-__
1 Mercury in Soil or Sediment					
Mercury	mg/kg	0.00164	0.000400 U	0.0477	0.0101
1 Percent Solid					
Solids, percent	%	99.9	100	72.9	83.8
1 TCLP Mercury in Soil					
Mercury	mg/L	0.000250 U	0.000250 U	0.000250 U	0.000679
1 TCLP Metals in Soil					
Arsenic	mg/L	0.050 U	0.050 U	0.050 U	0.050 U
Barium	mg/L	0.297	1.86	0.919	1.12
Cadmium	mg/L	0.005 U	0.005 U	0.005 U	0.005 U
Chromium	mg/L	0.015 U	0.015 U	0.015 U	0.015 U
Lead	mg/L	6.84	0.050 U	0.050 U	0.050 U
Selenium	mg/L	0.050 U	0.050 U	0.050 U	0.050 U
Silver	mg/L	0.025 U	0.025 U	0.025 U	0.025 U
1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES					
Arsenic	mg/kg	5.0 U	5.0 U	9.5	5.9 U
Barium	mg/kg	24.6	147	177	146
Cadmium	mg/kg	1.0 U	1.0 U	2.4	1.8
Chromium	mg/kg	2.0 U	2.0 U	17.9	16.5
Lead	mg/kg	1020	5.0 U	32.5	52.6
Selenium	mg/kg	10.0 U	9.9 U	13.6 U	11.8 U
Silver	mg/kg	2.0 U	2.0 U	2.7 U	2.4 U



**ASR Number:** 7449**RLAB Approved Sample Analysis Results****04/21/2017****Project ID:** RWRECYCLE**Project Desc:** Recycletronics - RCRA sampling

Analysis/ Analyte	Units	5-__	6-__	6-FD	7-__
1 Mercury in Soil or Sediment					
Mercury	mg/kg	0.0245	0.0154	0.0151	0.000400 U
1 Percent Solid					
Solids, percent	%	79.0	63.3	65.5	100
1 TCLP Mercury in Soil					
Mercury	mg/L	0.00163	0.000250 U	0.000250 U	0.000939
1 TCLP Metals in Soil					
Arsenic	mg/L	0.050 U	0.050 U	0.050 U	0.050 U
Barium	mg/L	2.15	2.14	2.19	1.92
Cadmium	mg/L	0.007	0.007	0.007	0.005 U
Chromium	mg/L	0.015 U	0.015 U	0.015 U	0.015 U
Lead	mg/L	0.385	2.73	2.48	78.4
Selenium	mg/L	0.050 U	0.050 U	0.050 U	0.050 U
Silver	mg/L	0.025 U	0.025 U	0.025 U	0.025 U
1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES					
Arsenic	mg/kg	6.3 U	7.9 U	8.7	5.0 U
Barium	mg/kg	217	284	255	511
Cadmium	mg/kg	2.5	3.1	3.0	1.0 U
Chromium	mg/kg	20.3	62.2	55.6	2.0 U
Lead	mg/kg	407	1020	833	20700
Selenium	mg/kg	12.6 U	15.8 U	15.2 U	9.9 U
Silver	mg/kg	2.5 U	3.2 U	3.0 U	2.0 U

ASR Number: 7449

## RLAB Approved Sample Analysis Results

04/21/2017

Project ID: RWRECYCLE

Project Desc: Recycletronics - RCRA sampling

Analysis/ Analyte	Units	103-__	104-__	105-FB	106-__
1 Mercury in Soil or Sediment					
Mercury	mg/kg	0.00898	0.000400 U	0.000401 U	0.00164
1 Percent Solid					
Solids, percent	%	98.1	100	100	100
1 TCLP Mercury in Soil					
Mercury	mg/L	0.000312	0.000250 U	0.000250 U	0.000258
1 TCLP Metals in Soil					
Arsenic	mg/L	0.050 U	0.050 U	0.050 U	0.050 U
Barium	mg/L	1.60	0.739	0.063	0.331
Cadmium	mg/L	0.005 U	0.005 U	0.005 U	0.005 U
Chromium	mg/L	0.015 U	0.015 U	0.015 U	0.015 U
Lead	mg/L	3.86	11.0	0.050 U	8.54
Selenium	mg/L	0.050 U	0.050 U	0.050 U	0.050 U
Silver	mg/L	0.025 U	0.025 U	0.025 U	0.025 U
1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES					
Arsenic	mg/kg	5.1 U	5.0 U	5.0 U	5.0 U
Barium	mg/kg	185	74.7	2.0 U	21.6
Cadmium	mg/kg	1.0 U	1.0 U	1.0 U	1.0 U
Chromium	mg/kg	2.8	2.0 U	2.0 U	2.0 U
Lead	mg/kg	401	1960	5.0 U	1440
Selenium	mg/kg	10.1 U	9.9 U	9.9 U	10.0 U
Silver	mg/kg	2.0 U	2.0 U	2.0 U	2.0 U

ASR Number: 7449

## RLAB Approved Sample Analysis Results

04/21/2017

Project ID: RWRECYCLE

Project Desc: Recycletronics - RCRA sampling

Analysis/ Analyte	Units	107-__	201-__
1 Mercury in Soil or Sediment			
Mercury	mg/kg	0.000550	
1 Percent Solid			
Solids, percent	%	100	
1 TCLP Mercury in Soil			
Mercury	mg/L	0.000250 U	
1 TCLP Metals in Soil			
Arsenic	mg/L	0.050 U	
Barium	mg/L	0.244	
Cadmium	mg/L	0.005 U	
Chromium	mg/L	0.015 U	
Lead	mg/L	7.71	
Selenium	mg/L	0.050 U	
Silver	mg/L	0.025 U	
1 Total Metals Analysis of TCLP Metals in Soil by ICP-AES			
Arsenic	mg/kg	5.0 U	
Barium	mg/kg	9.6	
Cadmium	mg/kg	1.0 U	
Chromium	mg/kg	2.0 U	
Lead	mg/kg	1090	
Selenium	mg/kg	10.0 U	
Silver	mg/kg	2.0 U	
1 Mercury in Water			
Mercury	ug/L		0.313
1 TCLP Mercury in Water			
Mercury	mg/L		0.200 K
1 TCLP Metals in Water			
Arsenic	mg/L		N/A O
Barium	mg/L		N/A O
Cadmium	mg/L		N/A O
Chromium	mg/L		N/A O
Lead	mg/L		N/A O
Selenium	mg/L		N/A O
Silver	mg/L		N/A O
1 Total Metals Analysis of TCLP Metals in Water by ICP-AES			
Arsenic	ug/L		30
Barium	ug/L		1620
Cadmium	ug/L		19
Chromium	ug/L		72
Lead	ug/L		12600
Selenium	ug/L		50 U
Silver	ug/L		25 U

Sample Name	TCLP Lead
6	2.73
6FD	2.48
Standard Deviation	0.18
<b>Relative Standard Deviation</b>	<b>6.8%</b>

Sample Name	Total Lead
6	1020
6FD	833
Standard Deviation	132.23
<b>Relative Standard Deviation</b>	<b>14.3%</b>





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

**VIA HAND DELIVERY**

Mr. Aaron Rochester  
Owner/President  
Recycletronics  
1304 46<sup>th</sup> Street  
Sioux City, Iowa 51104

RE: Recycletronics  
All Locations

Dear Mr. Rochester:

Request for Information

On December 13, 2016, representatives of the U. S. Environmental Protection Agency inspected the Recycletronics facility located at 1220 Steuben Street, and also hand delivered a Letter of Warning/Request for Information. Both the inspection and the letter were issued under the authority of Section 3007 of the Resource Conservation and Recovery Act, 42 USC § 6927. The EPA received your response to the December 13, 2016 Request for Information on January 19, 2017.

Please note that Section 3008(g) of RCRA authorizes the EPA to pursue penalties for failing to respond adequately to requests for submissions of required information. The statutory maximum penalty is \$37,500 for violations that occurred from January 12, 2009, through November 2, 2015, and \$70,117 for violations that occur after November 2, 2015.<sup>1</sup> Additionally, Section 3008(a) authorizes the EPA to initiate a civil judicial or administrative enforcement action if you fail to respond to this Letter of Warning/Request for Information.

The EPA is requesting additional information regarding the compliance status of all Recycletronics locations. Enclosed is a list of questions and/or requested information along with instructions to be used in providing your response. Please carefully read and follow these instructions.

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<sup>1</sup> Section 3008(g) of RCRA authorizes the EPA to pursue \$25,000 for each day of non-compliance with the Information Request. The Federal Civil Penalties Inflation Adjustment Act of 1990, 28 USC § 2461, as amended by the Debt Collection Improvement Act of 1996, 31 USC § 3701, and most recently by the Federal Civil Penalties Inflation Adjustment Improvements Act of 2015, 28 USC § 2461, and implementing regulations at 40 CFR Part 19 increased these statutory maximum penalties to \$37,500 for violations that occurred from January 12, 2009, through November 2, 2015, and to \$70,115 for violations that occur after November 2, 2015.



Printed on Recycled Paper

Within 15 calendar days of receiving this letter, please mail your response to: Rebecca Wenner, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions to Rebecca Wenner, of my staff, at (913) 551-7644 or [wenner.rebecca@epa.gov](mailto:wenner.rebecca@epa.gov).

Sincerely,



Mary Goetz

Chief

Waste Enforcement and Materials Management  
Branch

Air and Waste Management Division

Enclosures (3)

cc: Amie Davidson, Supervisor, Contaminated Sites Section  
Iowa Department of Natural Resources  
Susan Johnson, Quality Bureau-Solid Waste, IDNR

**List of Requested Information  
Recycletronics**

1. Provide a copy of any recent sale agreement or asset purchase agreement for the sale of Recycletronics, Siouxland PC and/or Electronic Recycling, LLC. The term "recent" means any agreement entered into after January 1, 2017.
  
2. Provide the following information about materials/waste delivered to a 3035 Highway 75 North, Sioux City, Iowa:
  - a. Provide the name, address, and a contact phone number for the property owner.
  - b. Explain Recycletronics' operations performed at this property. For the purposes of this letter, the term "operations" mean processing, storing, accumulating, transporting, abandoning, disposing, or otherwise utilizing a site. If materials are being accumulated or stored, describe in detail the material being accumulated or stored and list the quantities of materials being accumulated or stored.
  - c. Provide the date, or approximate date, when operations began at this property, including the date waste/materials were moved to the property.
  - d. Provide the current number of employees at this property.
  - e. Provide a list of all Recycletronics equipment, materials, or waste remaining at this property (if not already provided under b. above).
  - f. Provide copies of any records for materials and/or waste located or formerly located at this site, including any shipping documents such as bills of lading, receipts, or manifests.
  - g. Explain any other business relations between Recycletronics, or Aaron Rochester, and this site.
  - h. List any additional information that would help EPA better understand Recycletronics' operations at this location.
  
3. Provide the following information about materials/waste delivered to 16998 160<sup>th</sup> Street, Akron, Iowa:
  - a. Provide the correct address of the property if it is not the one listed above.
  - b. Provide the name, address, and a contact phone number for the property owner.
  - c. Explain Recycletronics' operations performed at this property. For the purposes of this letter, the term "operations" mean processing, storing, accumulating, transporting, abandoning, disposing, or otherwise utilizing a site. If materials are being accumulated or stored, describe in detail the material being accumulated or stored and list the quantities of materials being accumulated or stored.
  - d. Provide the date, or approximate date, when operations began at this property, including the date waste/materials were first moved to the property.
  - e. Provide the current number of employees at this property.
  - f. Provide a list of all Recycletronics equipment, materials, or waste remaining at this property (if not already provided under c. above).
  - g. Provide copies of any records for materials and/or waste located or formerly located at this site, including any shipping documents such as bills of lading, receipts, or manifests.
  - h. Explain any other business relations between Recycletronics, or Aaron Rochester, and this site.
  - i. List any additional information that would help the EPA better understand Recycletronics' operations at this location.

4. The EPA is aware that Recycletronics has operated at all of the below listed properties. For the purposes of this letter, the term "operate" means to process, store, accumulate, transport, abandon, dispose, or otherwise utilize a site.

- 1313 11<sup>th</sup> Street, Suite D, Sioux City, Iowa
- 3313 Northbrook Drive, Sioux City, Iowa
- 1530 Steuben Street, Sioux City, Iowa
- 1220 Steuben Street, Sioux City, Iowa
- 1801-03 4<sup>th</sup> Street (3<sup>rd</sup> Floor), Sioux City, Iowa
- 2301 G Street, South Sioux City, Nebraska
- Foundry Road Site, east of the G Street location on Foundry Road

Please provide the following information for any and all additional sites where Recycletronics has operated or is currently operating (as that term is defined above):

- a. Provide the address.
  - b. Provide the name, address, and contact information for the property owner.
  - c. Explain Recycletronics' operations performed at each property (this should include all processing, storage, accumulation, transportation, disposal or other operations). If materials are being accumulated or stored, describe in detail the materials being accumulated or stored and list the quantities.
  - d. Provide the date, or approximate date, when operations began at each property, including the date waste/materials were first moved to each property.
  - e. Provide the current number of Recycletronics' employees at each property.
  - f. If Recycletronics' operations have ceased, provide the date that operations ended.
  - g. Provide a list of all Recycletronics' equipment, materials, or waste remaining at each property (if not already provided under c. above).
  - h. Provide copies of any records for materials and/or waste located or formerly located at this site, including any shipping documents such as bills of lading, receipts, or manifests.
  - i. Explain any other business relations between Recycletronics, or Aaron Rochester, and each site and its property owner.
  - j. List any additional information that would help the EPA better understand Recycletronics operations at each location.
5. For the last five years, provide legible copies of all receipts for disposal or recycling of leaded glass by Recycletronics.
6. For the last five years, provide legible copies of all transportation documents for any shipments of leaded glass from any Recycletronics' operations to a disposal facility or recycler or another CRT recycler.
7. For the last five years, provide legible copies of any documents that support delivery of leaded glass from Recycletronics to any facility for disposal or recycling facility, or to any other facility that may be using the glass for any purpose. These documents may include, but are not limited to, sales receipts, payment receipts, transfer of ownership, bills of lading, manifests, etc.
8. Provide legible copies of all documents that show shipments of CRTs from collection events, other recyclers, or from any other source between January 1, 2013, and the present date.



### **3007 RESPONSE INSTRUCTIONS**

- \* Identify the Person(s) responding to this request on your behalf.
- \* Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- \* For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- \* For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- \* For each numbered item, identify all persons consulted in the preparation of the answer.
- \* For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- \* If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- \* If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- \* If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- \* You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- \* The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- \* A request for an extension to the time limit for responding must be in writing and must be postmarked within 5 calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- \* Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at [www.epa.gov/epahome/cfr40.htm](http://www.epa.gov/epahome/cfr40.htm).
- \* This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.
- \* The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$95,284 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter of Warning/Request for Information issued pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §

6927, was hand delivered on April 4, 2017

to Aaron Rochester.

Rebecca Wanner Physical Scientist  
Name/Title

4/4/2017  
Date

## PHOTO LOG

**Facility Name/City:** Recycletronics (Sioux City, Iowa, Sioux City, Nebraska, Akron, Iowa)

**Facility ID #:** None

**Date:** April 4-5, 2017

**Photographer:** Rebecca Wenner

**Type of Camera:** LG90 Cell Phone

**Digital Recording Media:** Micro SD Card

**All digital photos were copied by:** Rebecca on May 1, 2017.

**All digital photos were copied to:** CD-R

**Original copy is stored in:** CD-R Digital photos were downloaded to CD-R by Rebecca Wenner.

No changes were made in the original image files prior to storage on the CD-R.



Report Photo#	Photographer	Date	Approx. Time	File Name (2017040x_xxxx xx.jpg)	Description
1	Rebecca Wenner	04/04/2017	0834	4-083414	Indoors facing East, Steuben Street Site – A view of the office area where processing of equipment occurs.
2	Rebecca Wenner	04/04/2017	0834	4-083420	Indoors facing Northwest, Steuben Street Site – A view of the office area where processing of equipment occurs.
3	Rebecca Wenner	04/04/2017	0834	4-083425	Indoors facing West, Steuben Street Site – A view of the office area where processing of equipment occurs.
4	Rebecca Wenner	04/04/2017	0837	4-083725	Indoors facing West, Steuben Street Site – a view of the room before the warehouse.
5	Rebecca Wenner	04/04/2017	0839	4-083939_Pano	Indoors from West to South, Steuben Street Site – A panoramic view of the inside of the warehouse.
6	Rebecca Wenner	04/04/2017	0917	4-091734	Outdoors facing North, Steuben Street Site – A view of the south side of the building, west of the ramp.
7	Rebecca Wenner	04/04/2017	0917	4-091741	Outdoors facing Northeast, Steuben Street Site – Another view of the south side of the building, this view includes the ramp.
8	Rebecca Wenner	04/04/2017	0917	4-091753	Outdoors facing Northeast, Steuben Street Site – Another view of the ramp on the southeast corner of the building.

9	Rebecca Wenner	04/04/2017	0921	4-092149	Outdoors facing down into a Gaylord box of leaded glass. This box was located next to the dock on the south side of the building and contained leaded glass.
10	Rebecca Wenner	04/04/2017	0923	4-092315	Outdoors facing South, Steuben Street Site – A view from the dock on the south side of the building looking out onto the boxes shown in photo 6.
11	Rebecca Wenner	04/04/2017	0926	4-09627	Outdoors facing Northwest, Steuben Street Site – A closer view of some of the boxes shown in photo 6, showing the poor condition of some of the boxes. The box in the middle, spilling its contents is where Sample 1 was collected.
12	Rebecca Wenner	04/04/2017	0931	4-093140	Outdoors facing West, Steuben Street Site – A view of the southeast corner of the building.
13	Rebecca Wenner	04/04/2017	0931	4-093145	Outdoors facing West, Steuben Street Site – A view of the northeast corner of the building.
14	Rebecca Wenner	04/04/2017	0934	4-093440	Outdoors facing South, Steuben Street Site – Another view of the northeast corner of the building.
15	Rebecca Wenner	04/04/2017	0934	4-093446	Outdoors facing Southwest, Steuben Street Site – Another view of the northeast corner of the building.
16	Rebecca Wenner	04/04/2017	0934	4-093450	Outdoors facing Southwest, Steuben Street Site – A view of the north side of the building.
17	Rebecca Wenner	04/04/2017	1111	4-111155	Outdoors facing South, Steuben Street Site – A closer view of some of the boxes of glass on the north side of the building. The glass appears to be a mixture of panel glass and leaded glass.
18	Rebecca Wenner	04/04/2017	1237	4-123739	Outdoors facing Southeast, Raymond Park, 24 <sup>th</sup> and C Street – An overview of the park where the background soil sample was collected.



19	Rebecca Wenner	04/04/2017	1339	4-133943	Outdoors facing Southeast, G Street Site – A view of the northwest corner of the glass pile. Sample 4 was taken approximately where the red crate sits, about 79 inches from the northwest corner of the pile.
20	Rebecca Wenner	04/04/2017	1353	4-135323	Outdoors facing West, G Street Site – A view of the northeast corner of the glass pile. Sample 5 (XRF Reading 47) was taken approximately where the red crate sits, about 12 feet from the northeast corner of the pile.
21	Rebecca Wenner	04/04/2017	1355	4-135507	Outdoors facing down, G Street Site – A closer view of the location where Sample 5 was taken. This view shows glass that appears to have run off the concrete from the pile.
22	Rebecca Wenner	04/04/2017	1404	4-140428	Outdoors facing down, G Street Site – A closer view of the location where Sample 5 was taken. This view shows glass that appears to have run off the concrete from the pile.
23	Rebecca Wenner	04/04/2017	1406	4-140614	Outdoors facing Northeast, G Street Site – A view of the location where Sample 6 was taken approximately where the red crate sits, about 16 feet east of the sample 5 location. This area appeared to have sediment that has collected from runoff from the concrete where the glass pile sits.
24	Rebecca Wenner	04/04/2017	1554	4-155430	Outdoors facing East, Foundry Road Site – An overview of the pile of dirt and glass located on the eastern edge of the site. Glass is spread out on the ground from where the photo is taken in the middle of the site to where the pile is located next to the corn field.

25	Rebecca Wenner	04/04/2017	1732	4-173241	Indoors facing Northeast, Akron Farm Site – A view of the boxes from the south end of the building. The boxes are stacked 2 and 3 high throughout the building and there is no space to walk between them. The boxes on this end of the building appeared to contain mixed leaded and non-leaded glass (funnel and panel glass respectively).
26	Rebecca Wenner	04/04/2017	1732	4-173256	Indoors facing North, Akron Farm Site – Another view of the boxes from the south end of the building.
27	Rebecca Wenner	04/04/2017	1733	4-173312	Indoors facing East, Akron Farm Site – Another view of the boxes from the south end of the building. Sample 104 was taken from the open box in the bottom left of the photo.
28	Rebecca Wenner	04/04/2017	1749	4-174954	Indoors facing South, Akron Farm Site – A view of the boxes from the north end of the building. This view shows how tightly packed in the building the boxes are, basically filling the space from wall to wall. The boxes on the north end appear to contain CRTs (it was not clear if they are intact).
29	Rebecca Wenner	04/04/2017	1750	4-175032	Indoors facing South, Akron Farm Site – Another view of the boxes from the north end of the building.
30	Rebecca Wenner	04/04/2017	1750	4-175039	Indoors facing Southeast, Akron Farm Site – Another view of the boxes from the north end of the building.
31	Rebecca Wenner	04/04/2017	1759	4-175912	Outdoors facing Southeast, Akron Farm Site – A view of the building where the boxes of glass are stored. The photo is taken from the driveway to the house, the building is the farthest from the house, the largest building on the property.

32	Rebecca Wenner	04/05/2017	1100	5-110056	Indoors facing Southwest, Feed Mill Site – A view from the top mezzanine on top of the office area. Overview of the containers in the building looking south with the following photos rotating to the west and northwest. This view shows the south end of the building.
33	Rebecca Wenner	04/05/2017	1101	5-110104	Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the southwestern portion of the building (facing Southwest).
34	Rebecca Wenner	04/05/2017	1101	5-110116	Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the western side of the building (facing Southwest).
35	Rebecca Wenner	04/05/2017	1109	5-110940	Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the western side of the building (facing Northwest).
36	Rebecca Wenner	04/05/2017	1109	5-110946	Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the western side of the building (facing Northwest).
37	Rebecca Wenner	04/05/2017	1109	5-110954	Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the northwestern corner of the building (facing North).
38	Rebecca Wenner	04/05/2017	1110	5-111051	Indoors facing West, Feed Mill Site – A closer view of the contents and condition of some containers.
39	Rebecca Wenner	04/05/2017	1113	5-111320	Indoors facing West, shows a container that has collapsed under another container.
40	Rebecca Wenner	04/05/2017	1115	5-111510	Indoors, direction unknown, shows a container collapsing under another container.
41	Rebecca Wenner	04/05/2017	1116	5-111633	Indoors, direction unknown, shows a container that has fallen.

42	Rebecca Wenner	04/05/2017	1139	5-113901	Indoors facing Northwest, Feed Mill Site – A closer view of the condition of some containers.
43	Rebecca Wenner	04/05/2017	1139	5-113905	Indoors facing Northwest, Feed Mill Site – A closer view of the contents and condition of some containers (same containers as Photo 42).
44	Rebecca Wenner	04/05/2017	1139	5-113914	Indoors facing East, Feed Mill Site – A closer view of the contents and condition of some containers.
45	Rebecca Wenner	04/05/2017	1144	5-113927	Indoors facing East, Feed Mill Site – A closer view of the contents and condition of some containers.
46	Rebecca Wenner	04/05/2017	1312	5-114439	Outdoors, Northwest – An overview of the Feed Mill Site building.
47	Rebecca Wenner	04/05/2017	1317	5-131246	Indoors facing Northeast, 3 <sup>rd</sup> floor, Scandinavian Building – A view of northeast corner of the building.
48	Rebecca Wenner	04/05/2017	1317	5-131723	Indoors facing East, 3 <sup>rd</sup> floor, Scandinavian Building – A view of the Eastern edge of the building.
49	Rebecca Wenner	04/05/2017	1317	5-131734	Indoors facing Southeast, 3 <sup>rd</sup> floor, Scandinavian Building – A view of the Eastern edge of the building.
50	Rebecca Wenner	04/05/2017	1317	5-131747	Indoors facing Southeast, 3 <sup>rd</sup> floor, Scandinavian Building – A view of the Eastern edge of the building.
51	Rebecca Wenner	04/05/2017	1317	5-131759	Indoors facing Southeast, 3 <sup>rd</sup> floor, Scandinavian Building – A view of the Eastern edge of the building.
52	Rebecca Wenner	04/05/2017	1319	5-131952	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A closer view of a label on a box stating that it contains CRTs and leaded glass.
53	Rebecca Wenner	04/05/2017	1325	5-132555	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A closer view of the contents of an open box. This is representative of the boxes we were able to look into, they all contained broken CRTs.
54	Rebecca Wenner	04/05/2017	1328	5-132828	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a Universal Waste Label on a container.



55	Rebecca Wenner	04/05/2017	1329	5-132930	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a Waste Management recycling services label dated 4/11/11, “non-commodity CRTs (State of MA)”.
56	Rebecca Wenner	04/05/2017	1331	5-133132	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a Waste Management recycling services label dated 3/28/11, “non-commodity CRTs (State of MA)”.
57	Rebecca Wenner	04/05/2017	1331	5-133142	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a Universal Waste label on the same container as the label shown in Photo 56 (5-133132).
58	Rebecca Wenner	04/05/2017	1333	5-133305	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a Waste Management recycling services label “Control Ticket GS049” and “State of CA Universal Waste”.
59	Rebecca Wenner	04/05/2017	1333	5-133327	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a Waste Management recycling services label dated 1/17/11, “non-commodity CRTs (State of MA)”.
60	Rebecca Wenner	04/05/2017	1336	5-133617	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a Waste Management recycling services label dated 12/7/10, “non-commodity CRTs (State of MA)”.
61	Rebecca Wenner	04/05/2017	1352	5-135229	Poor quality photos taken by mistake.
62	Rebecca Wenner	04/05/2017	1353	5-135306	Poor quality photos taken by mistake.
63	Rebecca Wenner	04/05/2017	1353	5-135350	Poor quality photos taken by mistake.
64	Rebecca Wenner	04/05/2017	1355	5-135532	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – A view of a label on a container of CRTs. The label says “WM Mercury Waste” “21211 Durand Ave, Union Grove WI”.
65	Rebecca Wenner	04/05/2017	1355	5-135537	Indoors, 3 <sup>rd</sup> floor, Scandinavian Building – Another view of the label shown in photo 64 (5-135532).
66	Rebecca Wenner	04/05/2017	1400	5-140046	Outdoors facing Northeast, Scandinavian Building - An overview of the front of the Scandinavian Building.

Recycltronics  
Sioux City, Iowa and  
South Sioux City, Nebraska

RCRA CEI Photos

Photos taken by Rebecca Wenner  
on April 4 and 5, 2017

*Rebecca Wenner*



Recycletronics – Steuben Street Site  
April 4, 2017

Indoors facing East, Steuben Street Site  
– A view of the office area where  
processing of equipment occurs.

Photo 1

Rebecca Wenner *rw*



Recycletronics – Steuben Street Site  
April 4, 2017

Indoors facing Northwest, Steuben  
Street Site – A view of the office area  
where processing of equipment occurs.

Photo 2

Rebecca Wenner *rw*



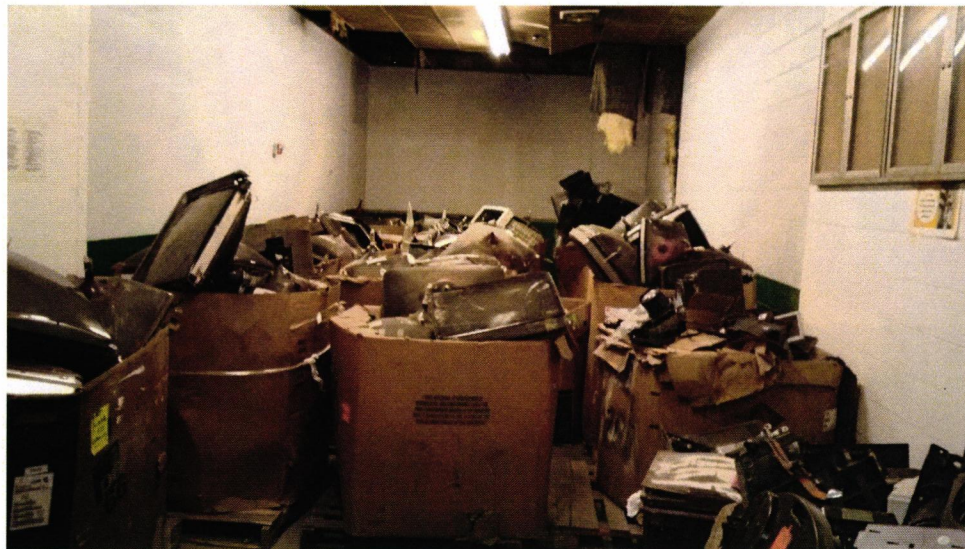


Recycletronics – Steuben Street Site  
April 4, 2017

Indoors facing West, Steuben Street Site – A view of the office area where processing of equipment occurs.

Photo 3

Rebecca Wenner *R*



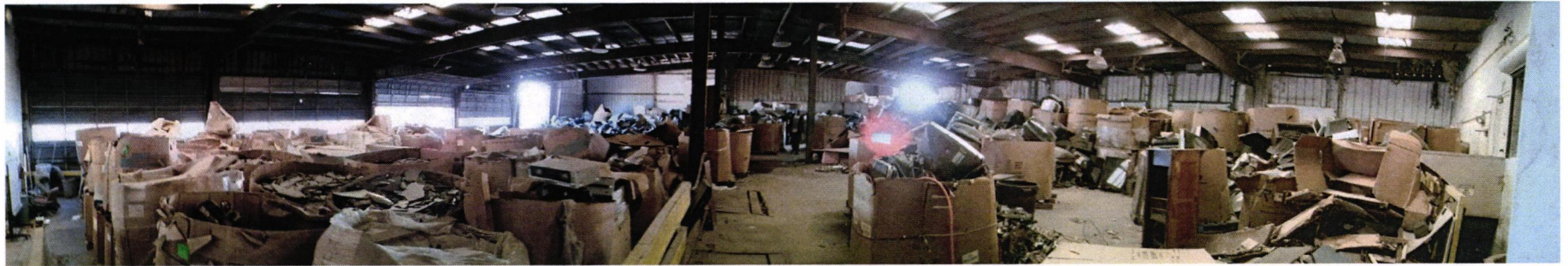
Recycletronics – Steuben Street Site  
April 4, 2017

Indoors facing West, Steuben Street Site – a view of the room before the warehouse.

Photo 4

Rebecca Wenner *R*





Recycletronics – Steuben Street Site  
April 4, 2017

Indoors from West to South, Steuben Street Site – A panoramic view of the inside of the warehouse.

Photo 5

Rebecca Wenner *R*





Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing North, Steuben Street Site  
– A view of the south side of the building,  
west of the ramp.

Photo 6

Rebecca Wenner *rw*



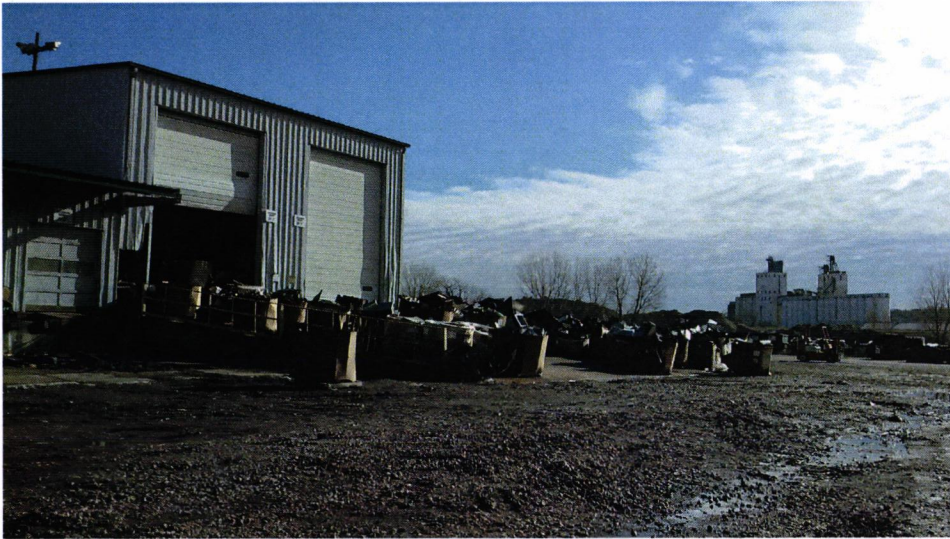
Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing Northeast, Steuben Street  
Site – Another view of the south side of the  
building, this view includes the ramp.

Photo 7

Rebecca Wenner *rw*





Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing Northeast, Steuben Street Site – Another view of the ramp on the southeast corner of the building.

Photo 8

Rebecca Wenner *RW*



Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing down into a Gaylord box of leaded glass. This box was located next to the dock on the south side of the building and contained leaded glass.

Photo 9

Rebecca Wenner *RW*





## Recycletronics – Steuben Street Site

April 4, 2017

Outdoors facing South, Steuben Street Site  
– A view from the dock on the south side of the building looking out onto the boxes shown in photo 6.

Photo 10

Rebecca Wenner *rw*



## Recycletronics – Steuben Street Site

April 4, 2017

Outdoors facing Northwest, Steuben Street Site – A closer view of some of the boxes shown in photo 6, showing the poor condition of some of the boxes. The box in the middle, spilling its contents is where Sample 1 was collected.

Photo 11

Rebecca Wenner *rw*





Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing West, Steuben Street Site – A view of the southeast corner of the building.

Photo 12

Rebecca Wenner *RW*



Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing West, Steuben Street Site – A view of the northeast corner of the building.

Photo 13

Rebecca Wenner *RW*





Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing South, Steuben Street Site – Another view of the northeast corner of the building.

Photo 14

Rebecca Wenner *rw*



Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing Southwest, Steuben Street Site – Another view of the northeast corner of the building.

Photo 15

Rebecca Wenner *rw*





Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing Southwest, Steuben Street Site – A view of the north side of the building.

Photo 16

Rebecca Wenner *rw*



Recycletronics – Steuben Street Site  
April 4, 2017

Outdoors facing South, Steuben Street Site – A closer view of some of the boxes of glass on the north side of the building. The glass appears to be a mixture of panel glass and leaded glass.

Photo 17

Rebecca Wenner *rw*





Recycletronics – Raymond Park,  
Background location

April 4, 2017

Outdoors facing Southeast, Raymond Park, 24<sup>th</sup> and C Street – An overview of the park where the background soil sample was collected.

Photo 18

Rebecca Wenner *rw*



Recycletronics – G Street Site

April 4, 2017

Outdoors facing Southeast, G Street Site – A view of the northwest corner of the glass pile. Sample 4 was taken approximately where the red crate sits, about 79 inches from the northwest corner of the pile.

Photo 19

Rebecca Wenner *rw*





Recycletronics – G Street Site  
April 4, 2017

Outdoors facing West, G Street Site – A view of the northeast corner of the glass pile. Sample 5 was taken approximately where the red crate sits, about 12 feet from the northeast corner of the pile.

Photo 20

Rebecca Wenner *rw*



Recycletronics – G Street Site  
April 4, 2017

Outdoors facing down, G Street Site – A closer view of the location where Sample 5 was taken. This view shows glass that appears to have run off the concrete from the pile.

Photo 21

Rebecca Wenner *rw*





## Recycletronics – G Street Site

April 4, 2017

Outdoors facing down, G Street Site – A closer view of the location where Sample 5 was taken. This view shows glass that appears to have run off the concrete from the pile.

Photo 22

Rebecca Wenner *RW*



## Recycletronics – G Street Site

April 4, 2017

Outdoors facing Northeast, G Street Site – A view of the location where Sample 6 was taken approximately where the red crate sits, about 16 feet east of the sample 5 location. This area appeared to have sediment that has collected from runoff from the concrete where the glass pile sits.

Photo 23

Rebecca Wenner *RW*





Recycletronics – Foundry Road Site  
April 4, 2017

Outdoors facing East, Foundry Road Site – An overview of the pile of dirt and glass located on the eastern edge of the site. Glass is spread out on the ground from where the photo is taken in the middle of the site to where the pile is located next to the corn field.

Photo 24

Rebecca Wenner *rw*



Recycletronics – Akron Farm Site  
April 4, 2017

Indoors facing Northeast, Akron Farm Site – A view of the boxes from the south end of the building. The boxes are stacked 2 and 3 high throughout the building and there is no space to walk between them. The boxes on this end of the building appeared to contain mixed leaded and non-leaded glass (funnel and panel glass respectively).

Photo 25

Rebecca Wenner *rw*





Recycletronics – Akron Farm Site  
April 4, 2017

Indoors facing North, Akron Farm Site –  
Another view of the boxes from the south  
end of the building.

Photo 26

Rebecca Wenner *rw*



Recycletronics – Akron Farm Site  
April 4, 2017

Indoors facing East, Akron Farm Site –  
Another view of the boxes from the south  
end of the building. Sample 104 was  
taken from the open box in the bottom  
left of the photo.

Photo 27

Rebecca Wenner *rw*





Recycletronics – Akron Farm Site  
April 4, 2017

Indoors facing South, Akron Farm Site –  
A view of the boxes from the north end of  
the building. This view shows how  
tightly packed in the building the boxes  
are, basically filling the space from wall  
to wall. The boxes on the north end  
appear to contain CRTs (it was not clear  
if they are intact).

Photo 28

Rebecca Wenner *rw*



Recycletronics – Akron Farm Site  
April 4, 2017

Indoors facing South, Akron Farm Site –  
Another view of the boxes from the north  
end of the building.

Photo 29

Rebecca Wenner *rw*





Recycletronics – Akron Farm Site  
April 4, 2017

Indoors facing Southeast, Akron Farm Site – Another view of the boxes from the north end of the building.

Photo 30

Rebecca Wenner *rw*



Recycletronics – Akron Farm Site  
April 4, 2017

Outdoors facing Southeast, Akron Farm Site – A view of the building where the boxes of glass are stored. The photo is taken from the driveway to the house, the building is the farthest from the house, the largest building on the property.

Photo 31

Rebecca Wenner *rw*





Recycletronics – Feed Mill Site  
April 5, 2017

Indoors facing Southwest, Feed Mill Site – A view from the top mezzanine on top of the office area. Overview of the containers in the building looking south with the following photos rotating to the west and northwest. This view shows the south end of the building.

Photo 32

Rebecca Wenner *pw*



Recycletronics – Feed Mill Site  
April 5, 2017

Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the southwestern portion of the building (facing Southwest).

Photo 33

Rebecca Wenner *pw*





Recycletronics – Feed Mill Site  
April 5, 2017

Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the western side of the building (facing Southwest).

Photo 34

Rebecca Wenner *rw*



Recycletronics – Feed Mill Site  
April 5, 2017

Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the western side of the building (facing Northwest).

Photo 35

Rebecca Wenner *rw*





Recycletronics – Feed Mill Site  
April 5, 2017

Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the western side of the building (facing Northwest).

Photo 36

Rebecca Wenner *rw*



Recycletronics – Feed Mill Site  
April 5, 2017

Continuation of the overview of containers in the building rotating from south to west to northwest. This view shows the northwestern corner of the building (facing North).

Photo 37

Rebecca Wenner *rw*



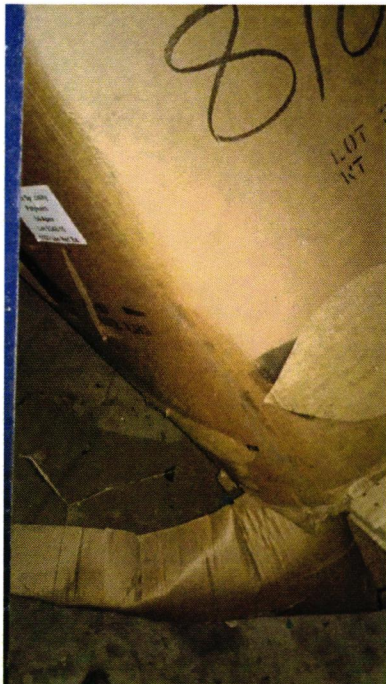


Recycletronics – Feed Mill Site  
April 5, 2017

Indoors facing West, Feed Mill Site – A closer view of the contents and condition of some containers.

Photo 38

Rebecca Wenner *rw*



Recycletronics – Feed Mill Site  
April 5, 2017

Indoors facing West, shows a container that has collapsed under another container.

Photo 39

Rebecca Wenner *rw*



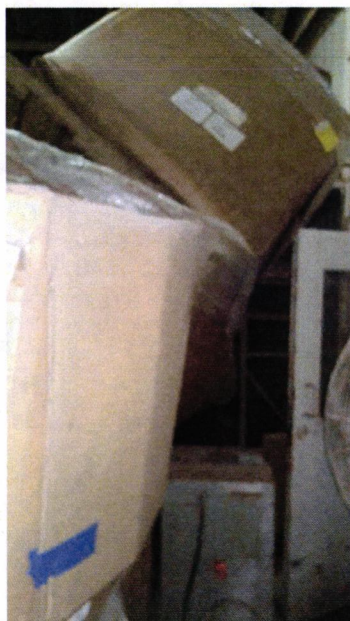


Recycletronics – Feed Mill Site  
April 5, 2017

Indoors, direction unknown, shows a container collapsing under another container.

Photo 40

Rebecca Wenner *rw*



Recycletronics – Feed Mill Site  
April 5, 2017

Indoors, direction unknown, shows a container that has fallen.

Photo 41

Rebecca Wenner *rw*



Recycletronics – Feed Mill Site  
April 5, 2017

Indoors facing Northwest, Feed Mill Site  
– A closer view of the condition of some containers.

Photo 42

Rebecca Wenner *RW*



Recycletronics – Feed Mill Site  
April 5, 2017

Indoors facing Northwest, Feed Mill Site  
– A closer view of the contents and condition of some containers (same containers as Photo 42).

Photo 43

Rebecca Wenner *RW*



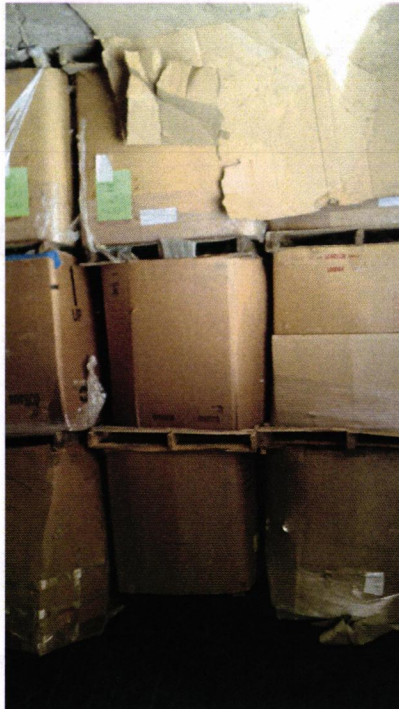


Recycletronics – Feed Mill Site  
April 5, 2017

Indoors facing East, Feed Mill Site – A closer view of the contents and condition of some containers.

Photo 44

Rebecca Wenner *rw*



Recycletronics – Feed Mill Site  
April 5, 2017

Indoors facing East, Feed Mill Site – A closer view of the contents and condition of some containers.

Photo 45

Rebecca Wenner *rw*





Recycletronics – Feed Mill Site  
April 5, 2017

Outdoors, Northwest – An overview of the Feed Mill Site building.

Photo 46

Rebecca Wenner *rw*



Recycletronics – Scandinavian Building  
April 5, 2017

Indoors facing Northeast, 3<sup>rd</sup> floor, Scandinavian Building – A view of northeast corner of the building.

Photo 47

Rebecca Wenner *rw*





Recycletronics – Scandinavian Building  
April 5, 2017

Indoors facing East, 3<sup>rd</sup> floor,  
Scandinavian Building – A view of the  
Eastern edge of the building.

Photo 48

Rebecca Wenner *rw*



Recycletronics – Scandinavian Building  
April 5, 2017

Indoors facing Southeast, 3<sup>rd</sup> floor,  
Scandinavian Building – A view of the  
Eastern edge of the building.

Photo 49

Rebecca Wenner *rw*





Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors facing Southeast, 3<sup>rd</sup> floor,  
Scandinavian Building – A view of the  
Eastern edge of the building.

Photo 50

Rebecca Wenner *rw*



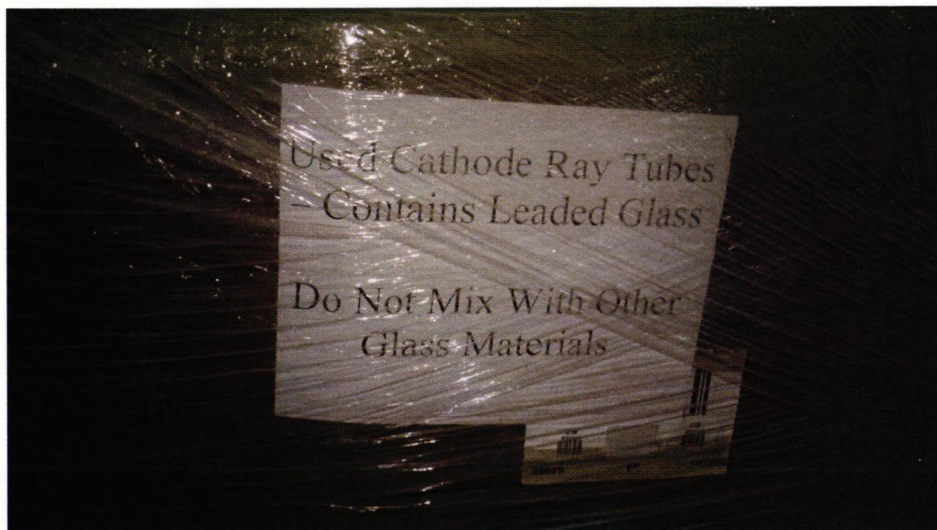
Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors facing Southeast, 3<sup>rd</sup> floor,  
Scandinavian Building – A view of the  
Eastern edge of the building.

Photo 51

Rebecca Wenner *rw*





Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A closer view of a label on a box stating that it contains CRTs and leaded glass.

Photo 52

Rebecca Wenner *rw*



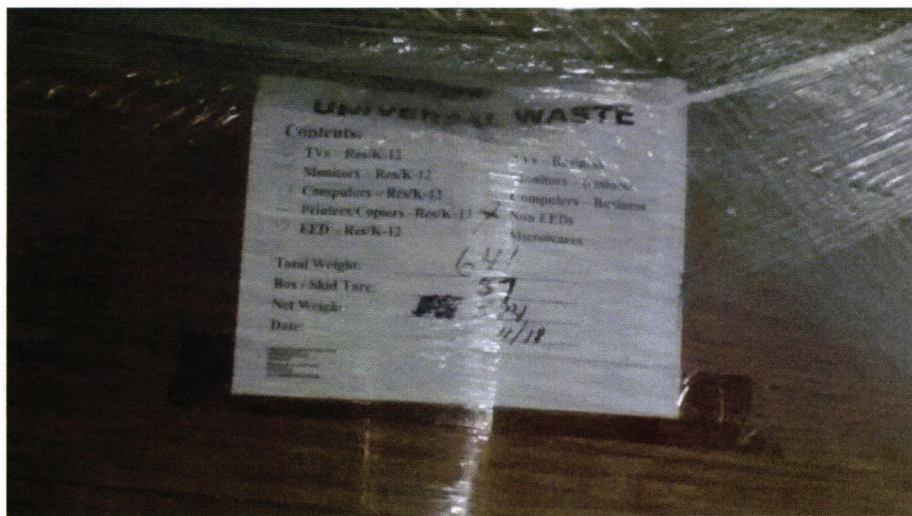
Recycletronics – Scandinavian Bldg  
April 5, 2017

A Indoors, 3<sup>rd</sup> floor, Scandinavian Building – A closer view of the contents of an open box. This is representative of the boxes were able to look into, they all contained broken CRTs. view of the blue hazardous waste tank.

Photo 53

Rebecca Wenner *rw*



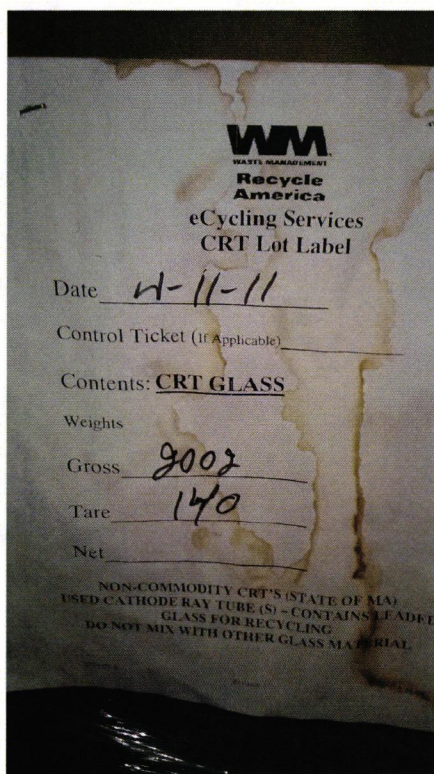


Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a Universal Waste Label on a container.

Photo 54

Rebecca Wenner *RW*

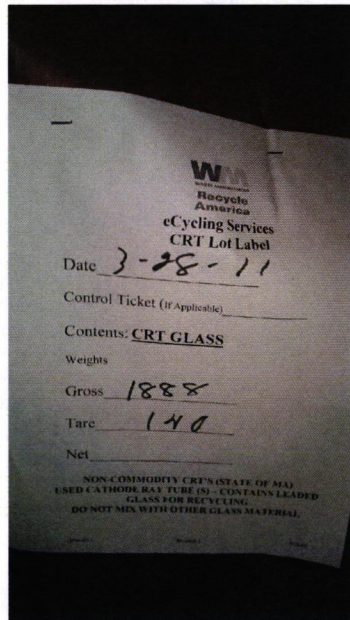


Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a Waste Management  
eCycling services label dated 4/11/11,  
“non-commodity CRTs (State of MA)”.

Photo 55

Rebecca Wenner *RW*

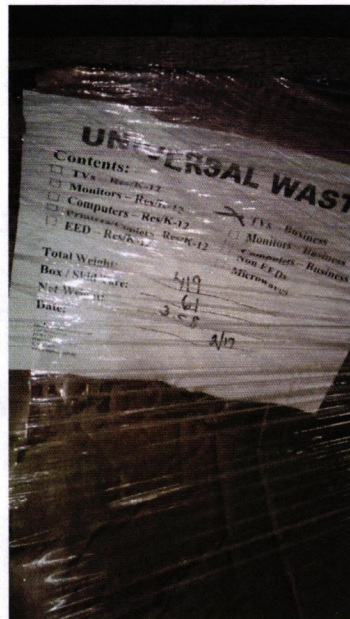


Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a Waste Management  
eCycling services label dated 3/28/11,  
“non-commodity CRTs (State of MA)”.

Photo 56

Rebecca Wenner *RW*



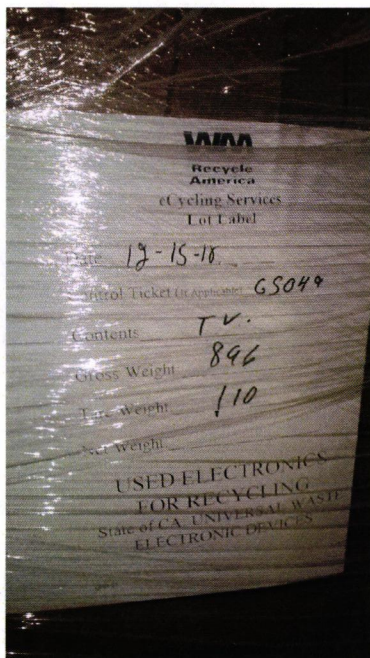
Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a Universal Waste label on  
the same container as the label shown in  
Photo 56 (5-133132).

Photo 57

Rebecca Wenner *RW*



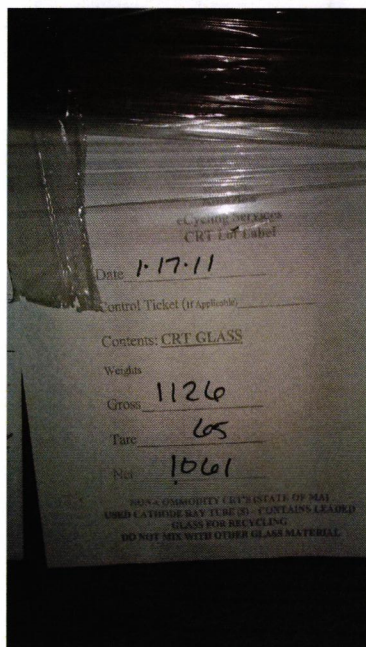


Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a Waste Management  
eCycling services label “Control Ticket  
GS049” and “State of CA Universal  
Waste”.

Photo 58

Rebecca Wenner *rw*

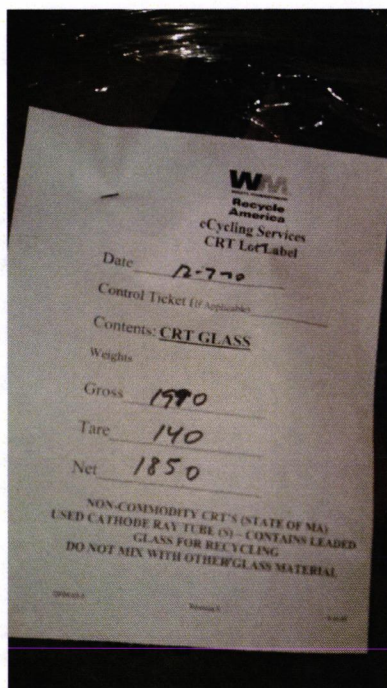


Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a Waste Management  
eCycling services label dated 1/17/11,  
“non-commodity CRTs (State of MA)”.

Photo 59

Rebecca Wenner *rw*

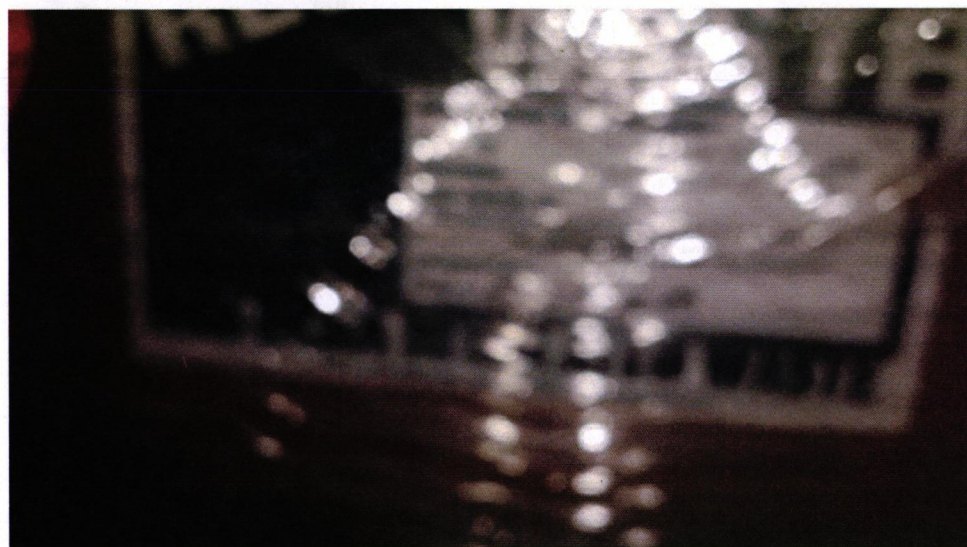


Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a Waste Management  
recycling services label dated 12/7/10,  
“non-commodity CRTs (State of MA)”.

Photo 60

Rebecca Wenner *RW*



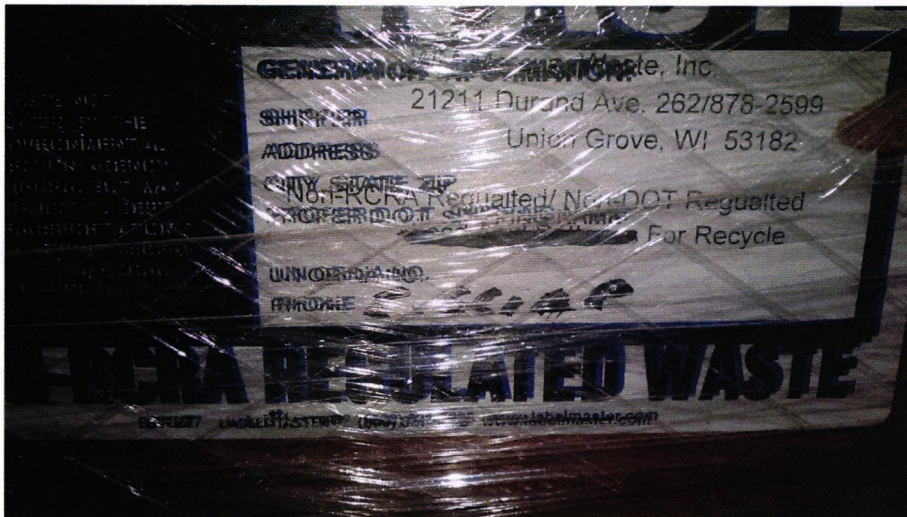
Recycletronics – Scandinavian Bldg  
April 5, 2017

Poor quality photos taken by mistake.

Photo 61

Rebecca Wenner *RW*



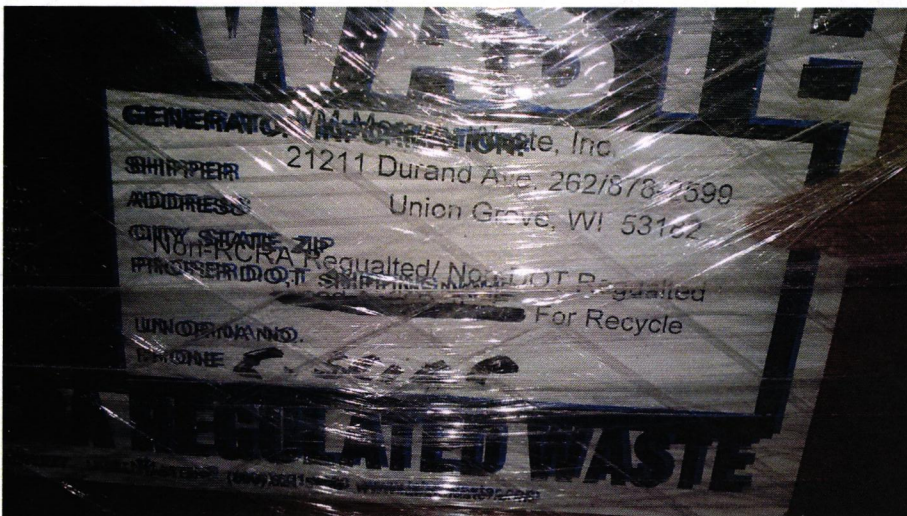


Recycletronics – Scandinavian Bldg  
April 5, 2017

Poor quality photos taken by mistake.

Photo 62

Rebecca Wenner *rw*



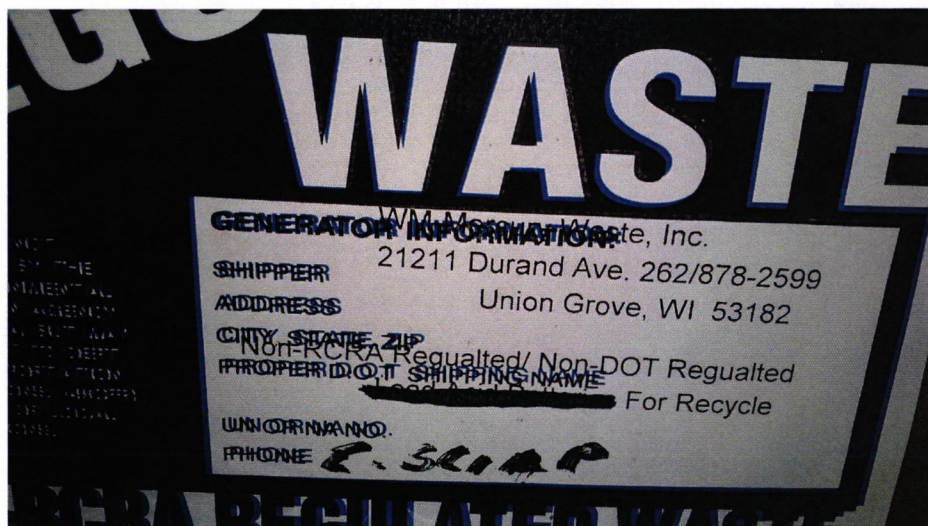
Recycletronics – Scandinavian Bldg  
April 5, 2017

Poor quality photos taken by mistake.

Photo 63

Rebecca Wenner *rw*





Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– A view of a label on a container of CRTs. The label says “WM Mercury Waste” “21211 Durand Ave, Union Grove WI”.

Photo 64

Rebecca Wenner *RW*



Recycletronics – Scandinavian Bldg  
April 5, 2017

Indoors, 3<sup>rd</sup> floor, Scandinavian Building  
– Another view of the label shown in photo 64 (5-135532).

Photo 65

Rebecca Wenner *RW*



Recycletronics – Scandinavian Bldg  
April 5, 2017

Outdoors facing Northeast, Scandinavian  
Building - An overview of the front of the  
Scandinavian Building.

Photo 66

Rebecca Wenner *rw*

Reactive Electronics  
1220 Steuben Street  
Sioux City, IA 51105

IAR000519827

04/04-05/2017 - Field Notes

Michael J. Martin - Inspector/CO



04/04/17

Page 13

7:30am Sioux City Police Station

Rebecca Werner - CO

Sgt. Williams Melville

Officer Chad Straman - Car 152

7:30am arrived at 1220 Steuben Street

Bldg. unlocked

R. Werner called A. Rochester (A.R.)

A.R. will have an employee on-site during the inventory/sampling

10:30am A.R. arrived on-site

R. Werner went over 3007 letter (catch question)

M. Martin - credentials, Section 3007 RCRA, 1001/1002, +

Asked if he wanted duplicate samples

A.R. stated that he did not want duplicates

A.R. - have not sold the company

- Ted Hamilton starting his own company Electronic Recycling Solutions

- Old Co Op (Feed Mill site) bot access to building

- Just stored CRT glass + some TVs from Northbrook to Feed Mill site

② of 13

- The Akron Jawa Farm - 9,000 sq. ft. building
- Storage of electronics + glass
- Stored since 2013 or 2014
- Sends a check to Dan Goodman
- Paul Seamon use to be the owner of the farm (Chef Paul)
- Has not processed at the site.
- Plan to process, once the weather gets better
- Triple D contracting hauled the materials to the Farm
- EPA knows <sup>all</sup> of his hiding spots.
- No additional sites
- September 2016 purged all records
- September 2010 glass was sent to Closed Loop, Doe Run, & Kusekoki
- Did not call to Ted Hamilton - Electronics Recycling Solutions
- Fred Mill 2014/2013 rented from Mike
- Empty 1313 11<sup>th</sup>, 3313 Northbrook, 1530 Steuben,  
& 1219 5<sup>th</sup> Street

# 1220 Staben XRF Readings

③ of 13

#13 252.9K lead glass

#14 199.5ppm unleaded glass

#15<sup>17</sup> 675 ppm unleaded glass

#16<sup>18</sup> 242.3ppm unleaded glass

#17<sup>19</sup> 297.2K lead glass

#18<sup>20</sup> 221.7K lead glass

#19<sup>22</sup> 199.7K lead glass

#20<sup>24</sup> 231.5K lead glass } Sample #1 (7449-1-Staben)

#21<sup>25</sup> 359ppm unleaded glass

#22<sup>26</sup> 333ppm unleaded glass } Sample #2 (7449-2-Staben)

Workarea - NW corner

46" x 100" x 16" Lead Glass Concentrator

Workarea - SW corner

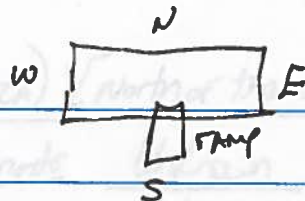
Pile of unprocessed electronic, Cd, T, + lead/unleaded glass

80" inches high, 77" x 10" inches - East, +

32" x 10" inches - center



## 1220 Storage Inventory.



④ of 13

Main Room / front Area (near entrance) - scattered <sup>or</sup> pay for's better (Gbs)

CRTs

5 Gbs

Components

5 ~~9~~ Gbs

4 small boxes

Wire

1 Gb

Room Before the Main Warehouse - 3 rows

CRTs

2 Gbs

Components

1 Gb

Warehouse - NW corner - 9 rows

CRTs

4 Gbs

Lead Glass

100 Gbs

Components

1 Gb

Warehouse - SW corner

Pile of unprocessed electronics, CRT, + lead/unleaded glass

80 inches high, 77 Ft + 10 inches - East, +

32 Ft + 6 inches - South

Warehouse - Middle Upper Area [north of the SW corner pile]

<u>CLTs</u>	<u>Lead Glass</u>	<u>Components</u>	<u>Unknown</u>
9 GBs	1 GB.	11 GBs	1 GB.

Warehouse - East Upper Area (By the ramp)

Pile of GBs - lead glass/mixed with CLTs on the top

120 inches high

45 ft long

✗ The area had no aisle space

Warehouse - Ramp (South)

Flat Screen TVs/Components

40 GBs

TVs on Pallets (In front)

12 TVs (contact)

Warehouse - West of Ramp Outside (R. Werner cart)

<u>Lead Glass</u>	<u>Components</u>	<u>E-waste</u>
5B	1 GB	1 GB



## Warehouse - East of Ramp Outside

⑥ of 13

### Flat Screens/Keyboards

60 GBs the Area 30 feet long - east + 25 feet long - north

## Warehouse - East wall Warehouse Outside

### Flat Screens

18 GBs

### Unprocessed Electronics

280 GBs

113 feet long Area

## Warehouse - North Wall Outside

### Lead Glass

53 GBs

### Components

10 pallets  
(not in boxes)

### Unknown

4 GBs

### Other (E-waste)

2 cubic yard dumpsters  
of Keyboards + radios

2 GBs of printers  
1 pallet of laptops

Keyboards / Cell-And Batteries  
(not in a box)

## Warehouse - <sup>mon/bill/17</sup> Northeast corner bottom - Inside

- A pile of plastic TV water shell + flat screens (see 2 broken CRTs)

- 45 ft long Area + at least 2 to 3 yard boxes high

α The area was full of plastic no space to walk inside



Warehouse - Inside Bottom (West of the plastic pile)

@ of 13

CRTs

Lead Glass

2 Gbs

28 Gbs

\* Station Totals

<u>CRTs</u>	<u>Lead Glass</u>	<u>Components</u>	<u>E-waste</u>	<u>Wire</u>	<u>Unknown</u>
41 Gbs	320 Gbs	19 Gbs	125 Gbs	1 Gb	5 Gbs
	One 5ft long pile (10000 high) warehouse East Area	4 small boxes 10 pallets	12 plastic TVs 2 atm. yard dumpsters 1 pallet of laptops	"	"
<u>Unprocessed Electronics</u>					
280 Gbs					

One pile Border high / 77ft - 10 inches - East / 32ft. Border - South  
any 04/04/17 (warehouse - SW corner)

Raymond Park (Sioux City, NE) XRF Ready - Field Background (FB)  
Background

#23 <sup>10</sup> 21 ppm  
<sub>min/low</sub>

G-Street (Sioux City, NE) XRF Reading - Soil

#31 41 ppm - Across the street by homes

#32 55 ppm - " "

#33 23 ppm - " "

#34 321 ppm - on the right of way by the pile

#35 129 ppm - " "

#37 89 ppm - " "

#38 74 ppm - " "

#40 67 ppm - " "

#42 418 ppm - " "

#43 531 ppm " " - Sample 4 7449-46

\* #44 or #45 (R. Werner read #50 - sunglare) 531 ppm " "

#46 341 ppm - on the right of way by the pile

#47 3263 ppm - " " → Sample 5 7449-56

#48 3,758 ppm - " " → Sample 6 7449-6-G

#49 42 ppm - Across the street by homes → Sample 6 FD 7449-6-FD



⑨  
of 13

#50 362 ppm - Across from the pile / tree stump  $\rightarrow$  04/04/17  
#51 158.7/K lead glass from the pile  $\leftarrow$  Sample 7  
#52 227.1/K lead glass from the pile  $\leftarrow$  7449-7-G Street

### GPS Soil Sample G-Street (Sioux City, NE)

- Sample 4 - 7449-G Street 79m from NW corner of pile  
 $42^{\circ}28'05.441''N$   $96^{\circ}24'19.070''W$
- Sample 5 - 7449-5-G Street 12ft NE corner of pile  
 $42^{\circ}28'06.045''N$   $96^{\circ}24'17.558''W$
- Sample 6 7449-6-G Street 10ft east from sample 5  
 $42^{\circ}28'06.101''N$   $96^{\circ}24'17.320''W$
- Sample 6 FB (same as sample 6)
- Sample 7 7449 mgn 04/04/17

\* D.A. Daw arrived on site at 3:05pm 04/04/17

### GPS Farby Site

Pile -  $42^{\circ}28'03.132''N$   $96^{\circ}23'51.810''W$

Sample B - Water next to the pile

DA - Ar bought boxes of glass on site 2015 then DA turned it  
+ removed the material



de Farley site - Muddy  
pile mixed with  
cracked glass

Farley Site (1300 Farley Road - Sioux City, NE) XRF readings

(10) of 13

#63<sup>53</sup> 38 ppm unleaded glass  
min 04/04/17

#64<sup>54</sup> 17.5K lead glass  
min 04/04/17

#65<sup>55</sup> 27.6K lead glass  
min 04/04/17

#67<sup>57</sup> 601 ppm unleaded glass  
min 04/04/17

#68<sup>58</sup> 233.0K lead glass  
min 04/04/17

#69<sup>59</sup> 1822 ppm lead glass  
min 04/04/17

#70<sup>60</sup> 263.0K lead glass  
min 04/04/17

Sample 9

7449-103 Farley

\* Arrived at the Akron Farm on 04/04/17 - 5:10pm

One building 586 ft width + 165 ft. long

1st row - double stroke

2nd row - to end of building. Triple stroke of  
lead glass [boxes were closed]

One 9,000 sq. ft. full building of boxes

\* Due to lack of cube space / safety hardware could  
not get the exact count - MSM

Akron Farm XRF Readings

⑪ of 13

- #61 273.2K lead glass } sample 10
- #62 28.3K lead glass
- #63 190.2K lead glass
- #64 25 ppm - grass outside the building

Field Blank - 7449-105-Blank (sample 11)

08/08/17 Feed Mill Site 10:41am

(13) of 13

Inventory - Gls with broken glass with GLTs on the top

10 rags (single stacked, double stacked, & triple stacked) + 4 stacked

564 gal/bd boxes (60s) Total

Feed Mill XRF Lead rags

#68 RCA Block - Pb 498 ppm (RCA standard)

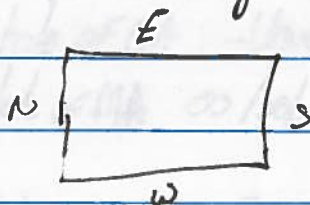
#69 251.2 K lead glass

#70 280.9 K

#71 267.6 K ] - sample 11  
lead glass

7489-106 FR

Scandium Bldy 08/08/17 1.00 pm



#72 194.1 K lead glass

#73 2837 K (with lead at date specified)

End of Note 08/08/17 - 11:24



## Scandinavian Bldg Inventory

(13) of 1.

OK Double checked GBs of intact/broken CRTs

West side of Bldg - 163 GBs

East side of Bldg (9 min) - 218 GBs

Northeast side of Bldg - 40 GBs

OK 421 GBs Total

## Observations

~~GB date 12/15/11~~ mm 08/05/17

One box dated 01/17/11 + 03/28/11 + 12/15/11 - need date

WM Recycle of America

E-Cycling Service - used electronics for recycling

1 box State of CA - Universal waste electronic devices 12/15/11 - need date

2 boxes State of MA 03/28/11 + 01/17/11 - Contain CRT Glass / non-commodity CRTs

XRF Reading - Scandinavian Bldg

#72 194.1K lead glass

#73 218.7K (late batch at data spreadsheet) } sample 11  
7447-107-XS

End of Notes 08/05/17 - NJS

## RECORD CONTROL CHECK SHEET

## Media

Air	RCRA	Water	Other
	✓		

**Date of Inspection** April 4-5, 2017

Facility ID Number [REDACTED]

## Exemption 2

<b>Facility Name and Address</b>	Recycletronics
	1220 Steuben Street
	Sioux City, Iowa 51105

The following documents pertaining to this activity are contained in the package:

<u>Document</u>		<u>Yes</u>	<u>No</u>	<u>NA</u>
Final Report with attachments	<u>122</u> Pages	( ✓ )	(   )	(   )
Field sheets	<u>      </u> Pages	(   )	( ✓ )	(   )
Chain of Custody	<u>      </u> Pages	(   )	( ✓ )	(   )
Field notes	<u>13</u> Pages	( ✓ )	(   )	(   )
Analytical data sheets	<u>      </u> Pages	(   )	( ✓ )	(   )
CD-ROM with Photo Chain of Custody	<u>1</u> Page	( ✓ )	(   )	(   )
Photographs (not included in this report)	<u>      </u> Pages	(   )	( ✓ )	(   )
Pre-inspection documents	<u>      </u> Pages	(   )	( ✓ )	(   )
Other documents (list below)				
<u>                                </u>	<u>      </u> Pages			
<u>                                </u>	<u>      </u> Pages			
<u>                                </u>	<u>      </u> Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side)

## CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Michael Madin  
Activity Leader's Signature

05/04/2017  
Date Signed

## DIGITAL IMAGE CHAIN OF CUSTODY FOR “ARCHIVAL” ORIGINAL IMAGES

### IMAGE RECORD

Name Recycletronics	Facility EPA ID [REDACTED] <span style="border: 1px solid red; padding: 2px;">Exemption 2</span>
Date Photos Taken April 4-5, 2017	Image Numbers For This Incident 66
Location Photos Taken <ul style="list-style-type: none"><li>• 1220 Steuben Street Sioux City, IA 51105</li><li>• 2301 G Street South Sioux City, NE 68766</li><li>• Foundry Road Parcel ID 220054789 Sioux City, NE 68766</li><li>• 16998 160<sup>th</sup> Street Akron, IA 51001</li><li>• 3035 Highway 75 North Sioux City, IA 51105</li><li>• 1801-03 4<sup>th</sup> Street Sioux City, IA 51101</li></ul>	These images have not been changed, altered, or manipulated in any way.
Comments	Signature <i>Rebecca Wrenner</i>

### ACCESS RECORD

Name	Organization/Division	Phone Number	Signature
Note – R7 Records Center maintains these records			